

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

14 CV 8176

IN RE:

GENERAL MOTORS LLC IGNITION SWITCH LITIGATION Case No. 1:14-md-02543-JMF

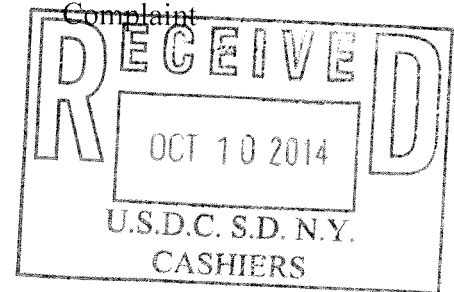
*This Document Relates To*

JOSEPH FLECK, INDIVIDUALLY AND AS  
REPRESENTATIVE OF THE ESTATE OF TERESA FLECK  
Together with all individuals whose names  
appear on the attached Exhibit "A"  
PLAINTIFFS,

Jury Trial Demanded

v.

GENERAL MOTORS, LLC  
DEFENDANT.



**PLAINTIFFS' ORIGINAL COMPLAINT**

COME NOW the individuals listed on the attached and fully incorporated Exhibit A (hereinafter "Named Plaintiffs"), through undersigned counsel, respectfully represent that:

**I. PRELIMINARY STATEMENT**

1. The Named Plaintiffs' causes of action are brought solely against GENERAL MOTORS, LLC ("New GM"). Plaintiffs do not assert any causes of action against General Motors Corporation ("Old GM").

2. Any references to General Motors Corporation, Old GM, or pre-sale order conduct in this Complaint are (a) for background and reference purposes only; or (b) referenced for the post-sale accidents resulting in personal injury and/or wrongful death claims, as asserted by the Plaintiffs listed in Exhibit "A." That is, under the June 26, 2009 Amended and Restated Master Sale and Purchase Agreement wherein New GM acquired certain Old GM assets, New

GM expressly assumed liability for post-sale accidents involving Old GM vehicles causing personal injury, loss of life or property damage. New GM also acquired knowledge of Old GM's activities and the defective ignition switch via the mind of the employees, officers, managers, books and records obtained and/or acquired as a result of the June 26, 2009 Amended and Restated Master Sale and Purchase Agreement and subsequent Sale Order. Thus, the duties of Old GM are part of the foundation for the liability assumed by New GM. Further, as identified therein, the Named Plaintiffs have claims for post-sale accidents involving Old GM vehicles that caused personal injury, loss of life or property damage and New GM is therefore expressly liable to the Named Plaintiffs.

## II. INTRODUCTION

3. At any given moment, an ignition switch in a wide variety of General Motors vehicles could fail, killing or maiming countless individuals. The disastrous system failures in GM vehicles are triggered by something as simple as a key chain on the vehicle's key or a bump in the road, as the ignition switch shifts from the "run" position into the "accessory/off" position, with a corresponding reduction or loss of power. *See* March 11, 2014 Letter from New GM to Ms. Nancy Lewis re: NHTSA Recall No. 14V-047, at 1 ("Until the recall repairs have been performed, it is very important that customers remove all items from their key rings, leaving only the vehicle key."); *see also* New GM Safety Recall Notice ("Th[e] risk increases if your key ring is carrying added weight (such as more keys or the key fob) or your vehicle experiences rough road conditions or other jarring or impact related events."). Yet, New GM also admits to its customers that lightening the key chain may not help as "rough road conditions or other jarring impact related events" could cause the vehicle to experience full loss of power, steering, braking and air bag deployment. *See* Mar. 24, 2014 Letter from Senator Blumenthal to Attorney General

Holder. Appropriately, the Old GM engineer who designed the ignition switch called it “the switch from hell.” *Report to the Board of Directors of General Motors Company Regarding the Ignition Switch Recalls*, authored by Anton R. Valukas of Jenner & Block (May 29, 2014) (or “Valukas Report”) at 5.

4. New GM’s refusal to honestly speak about the defective ignition switch has gone on too long—more than four and a half years since Old GM filed for bankruptcy. Throughout that time, New GM knew of the life-threatening danger, and yet concealed the risk from drivers. Considering both the time that Old GM discovered the ignition switch defect and the time that New GM learned about it, thirteen years have passed. New GM belatedly admits that there has been a death for every year of their collective silence. But a recent report suggests that the death toll is exponentially higher than New GM admits, with the number actually in the hundreds. *See* March 13, 2014 Letter from Center for Auto Safety to the Honorable David J. Friedman (“On March 7, the Center for Auto Safety (CAS) wrote you about NHTSA’s failure to utilize its Special Crash Investigations (SCI) of 2005 Cobalts and 2004 Ions and Early Warning Reports (EWR) of death claims filed by GM to open a defect investigation and order a recall. Examination of NHTSA’s Fatal Analysis Reporting System (FARS) reveals 303 deaths of front seat occupants in the recalled 2005-07 Cobalts and 2003-07 Ions where the airbag failed to deploy in non-rear impact crashes.”). This new figure is drawn from data on only two of the six recalled models, the Chevrolet Cobalt and Saturn Ion. The death toll is expected to increase significantly as the full gamut of defective vehicles and incidents come to light.

5. Old GM remained silent in 2001 when it received evidence that there was a problem with the now-recalled ignition switch in a pre-production Saturn Ion.

6. Old GM remained silent in 2004, when two Old GM engineers reported that the

Ion's ignition switch could accidentally turn off if inadvertently hit by the driver's knee. *See* March 11, 2014 Letter from GM to Nancy Lewis re: NHTSA Recall No. 14V-047; *see also* GM Recall Timeline. At that time, Old GM's engineers reportedly considered several remedies to increase torque in the key cylinder, but no action was taken "after consideration of the lead time required, cost and effectiveness of each of these solutions." *See* March 11, 2014 Letter from GM to Ms. Nancy Lewis re: NHTSA Recall No. 14V-047. Old GM remained silent throughout 2005, when it received numerous reports of its customers' vehicles stalling, including a fatal crash in which a Cobalt's airbags did not deploy. A proposal to redesign the ignition key was approved by Old GM, then cancelled for undisclosed reasons. Old GM sent its dealers a bulletin instructing them to tell customers who complained of stalling to remove extra items from their key chains. Old GM also developed a key insert to prevent the key ring from hanging so low, but warranty records indicate that only 474 customers received one, compared to the more than one million vehicles sold.

7. Old GM remained silent in 2006, when more than 30 complaints had been filed with the National Highway Traffic Safety Administration ("NHTSA") about unexpected stopping and stalling—at least a dozen of these complaints involved the 2005 Chevrolet Cobalt.

8. Old GM remained silent in 2007, when it began tracking frontal-impact Cobalt crashes with no airbag deployment and discovered that in four of ten of such incidents the ignition was in "accessory" mode. Old GM also remained silent about the defects when it elected to discontinue the Ion that same year, and when over 80 complaints about unexpected stopping or stalling were filed with the NHTSA, including at least 30 involving the now-recalled 2005 Chevrolet Cobalt.

9. Old GM remained silent in 2008, when the NHTSA received 90 complaints about

unexpected stopping or stalling for the now-recalled vehicles, including at least eight involving the 2006 Chevrolet HHR.

10. Old GM remained silent in 2009, as the NHTSA complaint toll reached 120, including at least one 2007 Chevrolet Cobalt.

11. New GM remained silent in 2009 when Old GM employees, officers, and managers with knowledge of the issue came to work for New GM.

12. New GM remained silent in 2009 when it acquired Old GM's books and records pursuant to the June 26, 2009 Amended and Restated Master Sale and Purchase Agreement and subsequent Sale Order, which referenced and detailed the defective ignition switch.

13. New GM remained silent in 2010, as the NHTSA complaint toll reached 170, including at least thirty-five involving the 2006 Chevrolet Cobalt.

14. New GM remained silent in 2013 when a technical expert discovered that the ignition switches in Ions and early-model Cobalts did not meet GM's torque specifications. Records reveal that Delphi Mechatronics provided Old GM with documents uncovering the 2006 ignition design change.

15. GM's silence over the past thirteen years speaks volumes. It resounds with an egregious and unprecedented failure to disclose a known defect, and reaches a crescendo of complete and utter disregard for human life. And, just "[a]s we must account for every idle word, so must we account for every idle silence."<sup>1</sup> The time for silence is over.

## **II. PARTIES**

16. The Named Plaintiffs are those individuals listed on the attached Exhibit A, which are incorporated herein as if set forth *in extenso*.

---

<sup>1</sup> Benjamin Franklin.

17. The Named Plaintiffs assert claims against Defendant General Motors LLC for personal injury and/or wrongful death stemming from post-sale accidents—that is, the accidents in question occurred on or after July 10, 2009.

18. The Named Plaintiffs’ personal injury and/or wrongful death claims involve one or more of the following GM vehicles: (a) the First Wave Defective Vehicles, consisting of Chevrolet Cobalt (2005-2010 model years); Chevrolet HHR (2006-2011 model years); Pontiac GS (2006-2007 model years); Pontiac Solstice (2006-2010 model years); Saturn Ions (2003-2007 model years); Saturn Sky (2007-2010 model years); and (b) the Second Wave Defective Vehicles, consisting of Buick LaCrosse (2005-2009 model years); Buick Lucerne (2006-2011 model years); Buick Regal LS (2004-2005 model years); Buick Regal GS (2004-2005 model years); Cadillac Deville (2000-2005 model years); Cadillac DTS (2004-2011 model years); Cadillac CTS (2003-2014 model years); Cadillac SRX (2004-2006 model years); Chevrolet Camaro (2010-2014 model years); Chevrolet Impala (2000-2014 model years); Chevrolet Monte Carlo (2000-2008 model years); Chevrolet Malibu (1997-2005 model years); Oldsmobile Intrigue (1998-2002 model years); Oldsmobile Alero (1999-2004 model years); Pontiac Grand Am (1999-2005 model years); Pontiac Grand Prix (2004-2008 model years); Daewoo G2x (2007-2009 model years); Opel GT (2007-2010 model years); Pontiac Pursuit (2005-2007 model years); and Vauxhall GT (2007-2010 model years). The First Wave Defective Vehicles and the Second Wave Defective Vehicles are collectively the “Defective Vehicles.”

19. Defendant General Motors, LLC (“New GM”), is a Delaware limited liability company. On July 10, 2009, General Motors, LLC acquired substantially all of the assets and assumed certain liabilities of General Motors Corporation by way of a Section 363 sale under Chapter 11 of the Bankruptcy Code. New GM assumed specific liabilities of Old GM, who

filed a voluntary petition for relief under Chapter 11 of the U.S. Bankruptcy Code on June 1, 2009. New GM acquired substantially all of Old GM's employees, officers and management personnel. New GM also acquired Old GM's designs, tools, inventory, books, records, and its key contracts, among other essential assets. The Named Plaintiffs' causes of action in this lawsuit are brought against New GM, and Plaintiffs do not assert any causes of action against General Motors Corporation ("Old GM").

20. Under the June 26, 2009 Amended and Restated Master Sale and Purchase Agreement, New GM expressly assumed liability for post-sale accidents involving Old GM vehicles causing personal injury, loss of life or property damages. The Named Plaintiffs listed in Exhibit A have claims for post-sale accidents involving Old GM vehicles that caused personal injury, loss of life or property damage, and New GM is therefore expressly liable to the Named Plaintiffs.

21. New GM also expressly assumed certain liabilities of Old GM, including certain statutory requirements:

From and after the Closing, Purchaser [New GM] shall comply with the certification, reporting and recall requirements of the National Traffic and Motor Vehicle Safety Act, the Transportation Recall Enhancement, Accountability and Documentation Act, the Clean Air Act, the California Health and Safety Code and similar Laws, in each case, to the extent applicable in respect of vehicles and vehicle parts manufactured or distributed by Seller.

22. In addition, [New GM] expressly set forth that it:

shall be responsible for the administration, management and payment of all Liabilities arising under (i) express written warranties of Sellers [General Motors Corporation] that are specifically identified as warranties and delivered in connection with the sale of new, certified used or pre-owned vehicles or new or remanufactured motor vehicle parts and equipment (including service parts, accessories, engines and transmissions) manufactured or sold by Sellers or Purchaser prior to or after the Closing and (ii) Lemon Laws.



23. At all times relevant to the claims in this lawsuit, Old GM and New GM were in the business of developing, manufacturing, and marketing cars throughout the United States generally, and specifically in each of the states of citizenship identified in Exhibit A. New GM has a network of authorized retailers that sell its vehicles and parts throughout the United States. New GM maintains its principal place of business at 300 Renaissance Center, Detroit, Michigan.

### **III. JURISDICTION AND VENUE**

24. Plaintiffs' filing of this Complaint in this district does not alter the choice-of-law analysis and does not constitute a waiver of any of Plaintiffs' rights to transfer to another district at the conclusion of pretrial proceedings in this case. Named Plaintiffs have filed this Complaint in this district in order to advance the efficient and orderly resolution of claims arising from Defendants' conduct and its attendant nationwide devastating effects. At the conclusion of pretrial proceedings in this case, each Named Plaintiff will be entitled to transfer of his or her claim to the state of his or her residence as listed on the attached Exhibit A.

25. This Court has diversity jurisdiction over this action under 28 U.S.C. § 1332(a) because the amount in controversy exceeds \$75,000.00 and Named Plaintiffs are citizens of different states than Defendant.

### **IV. FACTUAL BACKGROUND**

#### **A. General Background**

26. An auto manufacturer should never make profits more important than safety and should never conceal from consumers or the public any defects that exist in its vehicles. New GM's Vehicle Safety Chief, Jeff Boyer recently proclaimed that: "Nothing is more important than the safety of our customers in the vehicles they drive." *GM Announces New Vehicle Safety Chief*, <http://democrats.energycommerce.house.gov/sites/default/files/documents/Testimony->



Barra-GM-Ignition-Switch-Recall-2014-4-1.pdf Yet New GM failed to live up to this commitment. Appropriately, the Old GM engineer who designed the ignition switch called it “the switch from hell.” *Report to the Board of Directors of General Motors Company Regarding the Ignition Switch Recalls*, authored by Anton R. Valukas of Jenner & Block (May 29, 2014) (or “Valukas Report”) at 5.

27. The first priority of a car manufacturer should be to ensure that its vehicles are safe, and particularly that its vehicles have operable ignition systems, airbags, power-steering, power brakes, and other safety features that can prevent or minimize the threat of death or serious bodily harm in a collision. In addition, a car manufacturer must take all reasonable steps to ensure that, once a vehicle is running, it operates safely, and its critical safety systems (such as engine control, braking, and airbag systems) work properly until such time as the driver shuts down the vehicle. Moreover, a manufacturer that is aware of dangerous design defects that cause its vehicles to shut down during operation, or its airbags not to deploy, must promptly disclose and remedy such defects.

28. To date, GM has sold at least 15 million automobiles installed with defective ignition switches which slip into the “accessory” or “off” position and turn off the engine and the car’s vital engine systems without warning while the car is in motion. This ignition switch defect disables the power steering and power brakes and prevents the deployment of air bags in the vehicles.

**B. GM's Knowledge of Safety-Related Defects and Its Concealment of those Defects**

29. It has now come to light that the GM vehicles had safety related design defects that were known by Old GM as early as 2001, and by New GM as a result of the acquired knowledge from employees, officers, and managers and the books and records that New GM

obtained and/or acquired as a result of the 2009 sale. During pre-production development of the Ion in 2001, Old GM became aware of issues relating to its ignition switch “passlock” system. Old GM’s 2001 internal report stated the problem included a “low detent plunger force” in the ignition switch. In 2003, before the launch of the 2005 Cobalt, Old GM became aware of incidents wherein the vehicle engine would suddenly lose power in the event the key moved out of the “run” position when the driver inadvertently contacted the key or steering column. An investigation of these issues was opened and, after consideration of the lead-time required and the cost effectiveness of potential solutions, the investigation was closed with no action taken.

30. The design of the ignition switch, position of the key lock module, and slot design of the key are hereinafter referred to as the “Key System.”

31. In 2002, Old GM began manufacturing and selling 2003 Saturn Ions with the defective Key System. It later began selling Chevrolet Cobalts with the same defective Key System.

32. In 2004, Old GM engineers reported that the ignition switch on the Saturn Ion was so weak and so low on the steering column that a driver's knee could easily bump the key and turn off the vehicle. This defect was sufficiently serious for an Old GM engineer, in January 2004, as part of Old GM's vehicle evaluation program, to affirmatively conclude, in writing, that “[t]his is a basic design flaw and should be corrected if we want repeat sales.”

33. In 2004, Old GM began manufacturing and selling the 2005 Chevrolet Cobalt. The Cobalt was a sister vehicle (essentially the same car with a different badge or name) of the Saturn Ion. As noted, Old GM installed the same Key System on the 2005 Cobalt as it did on the Saturn Ion.

34. On October 29, 2004, around the time of Old GM's market launch of the 2005 Cobalt, Gary Altman — Old GM's program-engineering manager for the Cobalt — test-drove the Cobalt with the standard key and key fob. During the test drive, when Altman's knee bumped the key, the engine turned off, causing the engine to stall. Altman reported this incident to GM.

35. In response to Altman's report, Old GM launched an engineering inquiry to investigate the potential for the key to move from the "run" to the "accessory/off" position during ordinary driving conditions. This inquiry is known within GM as a Problem Resolution Tracking System Inquiry ("PRTS"). The specific complaint which resulted in the PRTS was that the "the vehicle can be keyed off with knee while driving."

36. On February 1, 2005, as part of the PRTS, Old GM engineers concluded:

There are two main reasons that [sic] we believe can cause a lower effort in turning the key: 1. A low torque detent in the ignition switch. 2. A low position of the lock module in the column. (PRTS — Complete Report N172404).

As part of the PRTS, Old GM engineers also began looking into ways to solve the problem of the key moving from the "run" to the "accessory/off" position during ordinary driving.

37. On February 18, 2005, Old GM engineers presented several possible solutions to the Cockpit Program Integration Team ("CPIT"). Old GM engineers determined the only "sure solution" to resolve the problem of the key inadvertently moving from the "run" to the "accessory/off" position required changing from a low mount to a high mount lock module, which would considerably reduce the possibility of the key/key fob being impacted by a driver. According to Old GM engineers, this change in the key position on the lock module, combined with increasing the detent in the ignition switch, would be a "sure solution." Old GM, however,

through Altman, rejected this “sure solution,” in part, because the cost to implement the solution would be too high.

38. During this PRTS, Old GM also considered changing the key from a slot to a hole as a way to attempt to contain this problem, but not as a solution to the problem. Changing the key from a slot to a hole would reduce the lever arm of the key and the key chain. With the slot design, the key chain would hang lower on the key which would increase the torque force on the ignition switch when the chain was contacted or moved in any way. Old GM engineers determined this key change would significantly reduce the chance of the key inadvertently moving from the “run” to the “accessory/off” position during ordinary driving maneuvers.

39. An Old GM engineer conducted a cost analysis of this key change and determined that the cost to make this change would be less than one dollar per vehicle or around 57 cents per part. Old GM, however, rejected this proposed key change and, on March 9, 2005, Old GM closed the PRTS without taking any steps to fix the defective Key System in Ions and Cobalts. The PRTS detailed the reasons why Old GM took no action.

Per GMX001 PEM's [Gary Altman] directive we are closing this PRTS with no action. The main reasons are as follows: All possible solutions were presented to CPIT and VAPTR: a. The lead-time for all the solutions is too long. b. The tooling cost and piece price are too high. c. None of the solutions seem to fully countermeasure the possibility of the key being turned (ignition turn off) during driving. Thus **none of the solutions represents an acceptable business case** (emphasis added).

40. On February 28, 2005, Old GM issued a bulletin to its dealers regarding engine-stalling incidents in 2005 Cobalts and 2005 Pontiac Pursuits (the Canadian version of the Pontiac G5). The February 28, 2005 bulletin addressed the potential for drivers of these vehicles to inadvertently turn off the ignition due to low key ignition cylinder torque/effort. In the February

28, 2005 bulletin, Old GM provided the following recommendations/instructions to its dealers —

**but not to the Named Plaintiffs or to the public in general:**

There is potential for the driver to inadvertently turn off the ignition due to low key ignition cylinder torque/effort. The concern is more likely to occur if the driver is short and has a large heavy key chain.

In the cases this condition was documented, the driver's knee would contact the key chain while the vehicle was turning. The steering column was adjusted all the way down. This is more likely to happen to a person that is short as they will have the seat positioned closer to the steering column.

In cases that fit this profile, question the customer thoroughly to determine if this may be the cause. The customer should be advised of this potential and to take steps, such as removing unessential items from their key chains, to prevent it.

Please follow this diagnosis process thoroughly and complete each step. If the condition exhibited is resolved without completing every step, the remaining steps do not need to be performed.

41. At that time, however, Old GM knew that the inadvertent turning off of the ignition in the vehicles was due to design defects in the Key System in those vehicles, including the Saturn Ion, and **was not** limited to short drivers using large heavy key chains. Simply stated, as of February 2005, Old GM engineers knew that the Saturn Ion and Chevrolet Cobalt vehicles had the Key System safety-related defects discussed in this Complaint. GM failed to disclose and, in fact, concealed, the February 28, 2005 bulletin — and/or the information contained therein, from Saturn Ion and Chevrolet Cobalt owners, including the Named Plaintiffs, and sent affirmative representations to dealers that did not accurately describe the nature of the problem, the multiple design steps needed for a “sure solution” to the problem, and GM's knowledge of it.

42. Indeed, rather than disclosing this serious safety problem that uniformly affected all Saturn Ion cars, GM, instead, concealed and obscured the problems, electing to wait until

customers brought their cars to a dealership after an engine-stalling incident, and offered even its own dealers only an incomplete, incorrect, and insufficient description of the defects and the steps necessary to actually remedy them.

43. Under 49 C.F.R. § 573.6, GM was required to “furnish a report to the NHTSA for each defect . . . related to motor vehicle safety.” Instead of complying with its legal obligations, GM fraudulently concealed the Key System defect from the public — including Named Plaintiffs — and continued to manufacture and sell Ions and Cobalts with these known safety defects, causing the Named Plaintiffs to continue to own, operate or ride in vehicles that contained defective and dangerous ignition switches.

44. In March 2005, following its receipt of a customer complaint that his/her Cobalt vehicle ignition turned off while driving, Old GM opened another PRTS — Complete Report (0793/2005-US). Steve Oakley, the brand quality manager for the Cobalt, originated the PRTS. As part of the PRTS, Mr. Oakley reviewed an email dated March 9, 2005 from Jack Weber, an Old GM engineer. The subject of the email was “Cobalt SS Ignition Turn Off.” In the email, Mr. Weber stated:

I've had a chance to drive a Cobalt SS and attempt to turn off the ignition during heel/toe down shifting. Much to my surprise, the first time I turned off the ignition switch was during a normal traffic brake application on I96. After that I was able to do a static reproduction of the condition in a parking lot. I've attached photos of the condition with comments. My Anthropometric Measurements are attached below:  
Static view of keys, fob and registration hitting knee.  
Position of RKE fob during normal driving. Dynamic evaluation.  
View of steering column cover and Pass Key 3+ “lump” under the key slot.  
Key in run position, knee contacting the fob and the split ring is pulling on the key to move it to the “off” position. Static evaluation.  
Fob has levered around the steering column cover and turned the ignition off.  
Unobstructed view of the fob and column cover.

Attached below is documentation of a RAMSIS study performed to attempt to duplicate the real world condition.  
Please call at (586) 986-0622 with questions.

Jack Weber

Mr. Weber clearly identified the defects in the Key System while he was driving the Cobalt, which is essentially the same vehicle as the Saturn Ion.

45. Despite the clear evidence of the safety-related defect with the Key System, during the March 2005 PRTS, Old GM engineers decided not to reconsider any of the proposed solutions discussed during the February 2005 PRTS. Instead, the Old GM engineers leading the PRTS recommended that the sole corrective action GM should recommend would be to advise customers to remove excess material from their key rings. This recommendation was made despite the fact that Old GM knew that the inadvertent turning off of the ignition in these vehicles was due to design defects in the Key System, and was not limited to drivers having excess key ring materials.

46. In May 2005, Old GM, following its receipt of another customer complaint that the customer's Cobalt ignition turned off while driving, opened another PRTS. During the May 2005 PRTS, Old GM decided to redesign the key in order to reduce the possibility that a driver may inadvertently turn the key from the "run" to the "accessory/off" position during ordinary driving.

47. Despite this initial safety/redesign commitment, however, Old GM ultimately failed to follow through on its own decision and closed this PRTS without any action, further concealing what it knew from the public and continuing to subject the public, including the Named Plaintiffs, to the Defective Vehicles' serious safety risks.

48. At or about this same time, Old GM, through Alan Adler, Old GM's Manager, Product Safety Communications, issued the following statement with respect to the Chevrolet



Cobalt's inadvertent shut-off problems, affirmatively representing in its "Statement on Chevrolet Cobalt Inadvertent Shut-offs" that:

In rare cases when a combination of factors is present, a Chevrolet Cobalt driver can cut power to the engine by inadvertently bumping the ignition key to the accessory or off position while the car is running.

When this happens, the Cobalt is still controllable. The engine can be restarted after shifting to neutral.

GM has analyzed this condition and believes it may occur when a driver overloads a key ring, or when the driver's leg moves amid factors such as steering column position, seat height and placement. Depending on these factors, a driver can unintentionally turn the vehicle off.

Service advisers are telling customers they can virtually eliminate this possibility by taking several steps, including removing non-essential material from their key rings.

Ignition systems are designed to have "on" and "off" positions, and practically any vehicle can have power to a running engine cut off by inadvertently bumping the ignition from the run to accessory or off position.

49. Old GM's statement, however, was demonstrably false and misleading. Old GM's internal testing documents showed that these incidents occurred when drivers were using keys with the standard key fob. GM knew that these incidents were not caused by heavy key chains or a driver's size and seating position. GM also knew that removing the non-essential material from key rings would not "virtually eliminate" the possibility of inadvertent bumping of the ignition key from the "run" to the "accessory/off" position while the car was running.

50. GM's above-referenced statement was further demonstrably false and misleading because GM knew that these incidents were ultimately caused by the safety-related defects in the Key System identified in the February 2005 PRTS. GM's affirmative concealment of the problems with the defective vehicles, including the Saturn Ion and Cobalt cars, did not end there.

51. On July 29 2005, Amber Marie Rose (“Amber”), a sixteen-year-old Clinton, Maryland resident, was driving a 2005 Cobalt when she drove off the road and struck a tree head-on. Amber's driver's side frontal airbag did not deploy and she died as a result of the injuries she sustained in the crash.

52. Old GM received notice of Amber's incident in September 2005 and shortly thereafter opened an internal investigation file concerning the incident. During its investigation of the incident, Old GM learned that the key in Amber's Cobalt was in the “accessory/off” position at the time of the crash. During its investigation, Old GM also knew that the driver's side frontal airbag should have deployed given the circumstances of Amber's crash. Upon information and belief, Old GM subsequently entered into a confidential settlement agreement with Amber's mother.

53. In December 2005, shortly after it commenced its internal investigation into the incident leading to Amber's death, Old GM issued a Technical Service Bulletin (05-02-35-007) (the “TSB”). The TSB, which GM affirmatively represented applied to 2005-2006 Chevrolet Cobalts, 2006 Chevrolet 1-11-1Rs, 2005-2006 Pontiac Pursuit, 2006 Pontiac Solstices, and 2003-2006 Saturn Ions, provided, “Information on inadvertent Turning of Key Cylinder, Loss of Electrical System and no DTCs,” provided the following service information:

There is potential for the driver to inadvertently turn off the ignition due to low ignition key cylinder torque/effort.

The concern is more likely to occur if the driver is short and has a large and/or heavy key chain. In these cases, this condition was documented and the driver's knee would contact the key chain while the vehicle was turning and the steering column was adjusted all the way down. This is more likely to happen to a person who is short, as they have the seat positioned closer to the steering column.

In cases that fit this profile, question the customer thoroughly to determine if this may be the cause. The customer should be advised

of this potential and should take steps to prevent it - such as removing unessential items from their key chain.

Engineering has come up with an insert for the key ring so that it goes from a “slot” design to a hole design. As a result, the key ring cannot move up and down in the slot any longer - it can only rotate on the hole. In addition, the previous key ring has been replaced with a smaller, 13 mm (0.5 in) design. This will result in the keys not hanging as low as in the past.

54. As with its prior statements regarding the Defective Vehicles, the information Old GM provided in this TSB was also false and misleading. In the two PRTSs GM issued before it issued the TSB, GM engineers never represented that short drivers or heavy key chains were the reasons why these incidents were happening. Indeed, at the time it issued the TSB, Old GM knew that these incidents were happening to drivers of all sizes using keys with the standard key fobs. In other words, Old GM knew these incidents were not caused by short drivers with heavy key chains, but were caused by the safety-related defects in the Key System of its Defective Vehicles, including the Chevrolet Cobalt.

55. Not only did GM fail to address the safety defects, it covered-up and fraudulently concealed the facts from the Named Plaintiffs and the driving public. One GM Quality Service Manager, who drafted a TSB in connection with the ignition switch defects, stated “the term ‘stall’ is a ‘hot’ word that GM generally does not use in bulletins because it may raise a concern about vehicle safety, which suggests GM should recall the vehicle, not issue a bulletin.” Valukas Report at 92. GM personnel stated that “there was concern about the use of ‘stall’ in a TSB because such language might draw the attention of NHTSA.” *Id.* at 93.

56. GM’s widespread cover-up and deception was brought to light in the Valukas Report. Multiple GM employees confirmed that GM intentionally avoids using the word “stall” “because such language might draw the attention of NHTSA” and “may raise a

concern about safety, which suggests GM should recall the vehicle . . . .” Even GM’s CEO, Mary Barra, testified on June 18, 2014, before the United States House of Representatives Committee on Energy and Commerce, Subcommittee on Oversight and Investigation, that “we consider a stall to be a safety issue.”

57. In 2005, Old GM began buying back Cobalts from certain customers who were experiencing engine stalling incidents. GM never told the public, including the Named Plaintiffs, that it was buying back Cobalts under these circumstances. GM refused to buy back Cobalts from other customers who had also experienced engine-stalling incidents. In fact, for many of the customers who complained about experiencing engine-stalling incidents, GM never informed these customers of the TSB and/or the availability of the key insert.

58. On November 17, 2005, shortly after Amber’s death and immediately before Old GM’s issuance of the TSB, there was another incident involving a 2005 Cobalt in Baldwin, Louisiana. In that incident, the Cobalt went off the road and hit a tree. The frontal airbags did not deploy. Old GM received notice of this accident, opened a file, and referred to it as the “Colbert” incident.

59. On February 10, 2006, in Lanexa, Virginia, shortly after Old GM issued the TSB, a 2005 Cobalt drove off of the road and hit a light pole. As with the Colbert incident (above), the frontal airbags failed to deploy. The download of the SDM (the vehicle’s “black box”) showed the key was in the “accessory/off” position at the time of the crash. Old GM received notice of this accident, opened a file, and referred to it as the “Carroll” incident.

60. On March 14, 2006, in Frederick, Maryland, a 2005 Cobalt traveled off the road and struck a utility pole. The frontal airbags did not deploy. The download of the SDM showed

the key was in the "accessory/off" position at the time of the crash. Old GM received notice of this incident, opened a file, and referred to it as the "Oakley" incident.

61. On August 1, 2006, following its receipt of a customer complaint about a Cobalt stalling while driving, Old GM opened yet another PRTS relating to this issue. Old GM closed this PRTS on October 2, 2006 without taking any action.

62. In October 2006, Old GM updated the TSB (05-02-35-007) to include additional model years: the 2007 Saturn Ion and Sky, 2007 Chevrolet HEIR, 2007 Cobalt and 2007 Pontiac Solstice and Pontiac 05 vehicles. These vehicles had the same safety-related defects in the Key System as the vehicles in the original TSB.

63. On December 29, 2006, in Sellenville, Pennsylvania, a 2005 Cobalt drove off the road and hit a tree. The frontal airbags failed to deploy. Old GM received notice of this incident, opened a file, and referred to it as the "Frei" incident.

64. On February 6, 2007, in Shaker Township, Pennsylvania, a 2006 Cobalt sailed off the road and struck a truck. Despite there being a frontal impact in this incident, the frontal airbags failed to deploy. The download of the SDM showed the key was in the "accessory/off" position. Old GM received notice of this incident, opened a file, and referred to it as the "White" incident.

65. On August 6, 2007, in Cross Lanes, West Virginia, a 2006 Cobalt rear-ended a truck. The frontal airbags failed to deploy. Old GM received notice of this incident, opened a file, and referred to it as the "McCormick" incident.

66. On September 25, 2007, in New Orleans, Louisiana, a 2007 Chevrolet Cobalt lost control and struck a guardrail. Despite there being a frontal impact in this incident, the frontal

airbags failed to deploy. Old GM received notice of this incident, opened a file, and referred to it as the “Gathe” incident.

67. On October 16 2007, in Lyndhurst, Ohio, a 2005 Chevrolet Cobalt traveled off road and hit a tree. The frontal airbags failed to deploy. Old GM received notice of this incident, opened a file, and referred to it as the “Breen” incident.

68. On April 5, 2008, in Sommerville, Tennessee, a 2006 Chevrolet Cobalt traveled off the road and struck a tree. Despite there being a frontal impact in this incident, the frontal airbags failed to deploy. The download of the SDM showed the key was in the “accessory/off” position. Old GM received notice of this incident, opened a file, and referred to it as the “Freeman” incident.

69. On May 21, 2008, in Argyle, Wisconsin, a 2007 Pontiac G5 traveled off the road and struck a tree. Despite there being a frontal impact in this incident, the frontal airbags failed to deploy. The download of the SDM showed the key was in the “accessory/off” position. Old GM received notice of this incident, opened a file, and referred to it as the “Wild” incident.

70. On May 28, 2008, in Lufkin, Texas, a 2007 Chevrolet Cobalt traveled off the road and struck a tree. Despite there being a frontal impact in this incident, the frontal airbags failed to deploy. Old GM received notice of this incident, opened a file, and referred to it as the “McDonald” incident.

71. On September 13, 2008, in Lincoln Township, Michigan, a 2006 Chevrolet Cobalt traveled off the road and struck a tree. Despite there being a frontal impact in this incident, the frontal airbags failed to deploy. Old GM received notice of this incident, opened a file, and referred to it as the “Harding” incident.

72. In 2008, in Rolling Hills Estates, California, a 2008 Chevrolet Cobalt traveled off the road and hit a tree. Despite there being a frontal impact in this incident, the frontal airbags failed to deploy. Old GM received notice of this incident, opened a file, and referred to it as the “Dunn” incident.

73. On December 6, 2008, in Lake Placid, Florida, a 2007 Chevrolet Cobalt traveled off the road and hit a utility pole. Despite there being a frontal impact in this incident, the frontal airbags failed to deploy. The download of the SDM showed the key was in the “accessory/off” position. Old GM received notice of this incident, opened a file, and referred to it as the “Grondona” incident.

74. In February 2009, Old GM opened yet another PRTS with respect to the Defective Vehicles — this time to investigate why the slot in the key in Cobalts allowed the key chain to hang too low in the vehicles, as well as the inadvertent shutting off of the vehicles. Through this PRTS, Old GM determined that changing the key from a slot to a hole would significantly reduce the likelihood of the ignition switch inadvertently turning off.

75. In March 2009, Old GM approved of the design change in the key from the slot to a hole. According to GM, this redesigned change was implemented in model year 2010 Chevrolet Cobalts. GM, however, chose not to provide these redesigned keys to the owners or lessees of any of the vehicles implicated in the TSB, including the 2005 Cobalt

76. The following timeline gives a short overview of some key points between 2004 and the present, as discussed above:

	<b>2005-2009</b>	
	GM learns of hundreds of field reports of Key System failures and multiple	
<b>2001-2004</b>		<b>2010-2014</b>
GM learns Key Systems		GM learns of more field reports of Key System failures and



are defective.

fatalities.

additional fatalities.

---

2005	2009	2014
GM engineers' proposed fix rejected; Amber Rose dies after airbag in Cobalt fails to deploy	GM declares and emerges from bankruptcy	GM issues inadequate recall over 10 years after learning its Key Systems are defective

77. Throughout this time period, GM was selling the Defective Vehicles to consumers for full price, and consumers were purchasing them believing that the vehicles were non-defective, but all the while GM was concealing the extent and nature of the defects in the Defective Vehicles.

**C. Old GM's Marketing Represented to the Public that the Defective Vehicles Were Safe.**

78. In a section called "safety," Old GM's Chevrolet website stated:

**OUR COMMITMENT**

Your family's safety is important to us. Whether it's a short errand around town or a cross-country road trip, Chevrolet is committed to keeping you and your family safe — from the start of your journey to your destination. That's why every Chevrolet is designed with a comprehensive list of safety and security features to help give you peace of mind. Choose from the safety features below to learn more about how they work, and which Chevy vehicles offer them.

79. Similarly, Old GM promoted its Saturn vehicle line on television with statements like "Putting people first," and "Saturn. People First." Saturn's print ad campaign featured advertisements like the following, which stated, among other things: "Need is where you begin. In cars, it's about things like reliability, durability and, of course, safety. That's where we started when developing our new line of cars." In sum, in order to increase sales, Old GM touted the safety of its vehicles. But, when the time came for the company to stay true to its words, GM did

not disclose its knowledge about the dangerous Key System defects to its customers, including the Named Plaintiffs.

**D. Meet the New GM, Same as the Old GM**

80. In 2009, GM declared bankruptcy and, weeks later, it emerged from bankruptcy. Both before and after GM's bankruptcy, the Key Systems in the Defective Vehicles continued to fail and New GM, in all iterations, continued to conceal the truth.

81. On May 15, 2009, New GM again met with Continental AG, an airbag component supplier, and requested that Continental download SDM data from a 2006 Chevrolet Cobalt accident where the airbags failed to deploy.

82. On December 31, 2010, in Rutherford County, Tennessee, a 2006 Chevrolet Cobalt traveled off the road and struck a tree. Despite there being a frontal impact in this incident, the frontal airbags failed to deploy. The download of the SDM showed the key was in the "accessory/off" position. New GM received notice of this incident, opened a file, and referred to it as the "Chansuthus" incident.

83. On December 31, 2010, in Harlingen, Texas, a 2006 Chevrolet Cobalt traveled off the road and struck a curb. Despite there being a frontal impact in this incident, the frontal airbags failed to deploy. New GM received notice of this incident, opened a file, and referred to it as the "Najera" incident.

84. On March 22, 2011, Ryan Jahr, a New GM engineer, downloaded the SDM from a Cobalt. The information from the SDM download showed that the key in that Cobalt turned from the "run" to the "accessory/off" position 3 to 4 seconds before the crash.

85. On December 18, 2011, in Parksville, South Carolina, a 2007 Chevrolet Cobalt traveled off the road and struck a tree. Despite there being a frontal impact in this incident, the frontal airbags failed to deploy. The download of the SDM showed the key was in the

“accessory/off” position. New GM received notice of this incident, opened a file, and referred to it as the “Sullivan” incident.

86. These incidents are not limited to vehicles of model year 2007 and before. According to New GM’s own investigation, there have been over 250 crashes involving 2008-2010 GM vehicles in which the airbags failed to deploy.

87. In 2010, New GM began a formal investigation of the frontal airbag non-deployment incidents in Chevrolet Cobalts and Pontiac G5s. GM subsequently elevated the investigation to a Field Performance Evaluation (“FPE”).

88. In August 2011, New GM assigned Engineering Group Manager, Brian Stouffer as the Field Performance Assessment Engineer (“FPAE”) to assist with the FPE investigation.

89. In Spring 2012, Stouffer asked Jim Federico, a high-level executive and chief engineer at New GM, to oversee the FPE investigation. Federico was the “executive champion” for the investigation to help coordinate resources for the FPE investigation.

90. In May 2012, New GM engineers tested the torque on the ignition switches for 2005-2009 Cobalts, 2007 and 2009 Pontiac 05s, 2006-2009 HHRs, and 2003-2007 Saturn Ion vehicles in a junkyard. The results of these tests showed that the torque required to turn the ignition switches in most of these vehicles from the “run” to the “accessory/off” position did not meet GM’s minimum torque specification requirements. These results were reported to Stouffer and other members of the FPE.

91. In September 2012, Stouffer requested assistance from a “Red X Team” as part of the FPE investigation. The Red X Team was a group of engineers within New GM assigned to find the root cause of the airbag non-deployments in frontal accidents involving GM vehicles. By that time, however, it was clear that the root cause of the airbag non-deployments in a majority

of the frontal accidents was the defective Key System. The Red X Team became involved in the investigation shortly after Mr. Stouffer's request.

92. During the field-performance-evaluation process, New GM determined that, although increasing the detent in the ignition switch would reduce the chance that the key would inadvertently move from the "run" to the "accessory/off" position, it would not be a total solution to the problem. Indeed, the New GM engineers identified several additional ways to actually fix the problem. These ideas included adding a shroud to prevent a driver's knee from contacting the key, modifying the key and lock cylinder to orient the key in an upward facing orientation when in the run position, and adding a push button to the lock cylinder to prevent it from slipping out of run. New GM rejected each of these ideas. New GM engineers understood that the key fob may be impacted and pinched between the driver's knee and the steering column which causes the key to be inadvertently turned from the run to accessory/off position. New GM engineers understood that increasing the detent in the ignition switch would not be a total solution to the problem. New GM engineers also believed that the additional changes to the Key System (such as the shroud) were necessary to fix the defects with the Key System. The New GM engineers clearly understood that increasing the detent in the ignition switch alone was not a solution to the problem but New GM concealed — and continued to conceal — from the public the nature and extent of the defects.

93. By 2012, Federico, Stouffer, and the remaining members of the Red X Team knew that the Key System in the Saturn Ion, the Cobalt, and the G5 vehicles had safety-related defects that would cause the key to move from the "run" to the "accessory/off" position while driving these vehicles. They also knew that when this happened the airbags would no longer work in frontal crashes. Federico, Stouffer, and the other members of the Red X Team also

understood that these safety-related defects had caused or contributed to numerous accidents and multiple fatalities. Despite this knowledge, New GM chose to conceal this information from the public, NHTSA, and the Named Plaintiffs.

94. In December 2012, in Pensacola, Florida, Ebram Handy, a New GM engineer, participated in an inspection of components from Brooke Melton's Cobalt, including the ignition switch. At that inspection, Handy, along with Mark Hood, a mechanical engineer retained by the Meltons, conducted testing on the ignition switch from Brooke Melton's vehicle, as well as a replacement ignition-switch for the 2005 Cobalt.

95. At that inspection, Handy observed that the results of the testing showed that the torque performance on the ignition switch from Brooke Melton's Cobalt was well below GM's minimum torque performance specifications. Handy also observed that the torque performance on the replacement ignition switch was significantly higher than the torque performance on the ignition switch in Brooke Melton's Cobalt.

96. In January 2013, Handy, in preparation for a Rule 30(b)(6) deposition, spoke with several GM engineers, including DeGiorgio and Stouffer. At that time, Handy knew that, based on the testing he had observed, the original ignition switch in the 2005 Cobalt failed to meet GM's minimum torque performance specifications. New GM knew that an ignition switch that did not meet its minimum torque performance requirements was a safety-related defect.

#### **E. GM Recalls**

97. On February 7, 2014, New GM, in a letter from Carmen Benavides, Director of Product Investigations and Safety Regulations for New GM, notified the NHTSA that it was conducting Recall No. 13454 for certain 2005-2007 model year Chevrolet Cobalts and 2007 model year Pontiac 05 vehicles. In its February 7, 2014, letter to NHTSA, New GM represented

that as replacement ignition switches became available, GM would replace the ignition switches on the Defective Vehicles.

98. On February 19, 2014, a request for timeliness query of General Motors' Safety Recall 13454 was sent to the NHTSA. The timeliness query pointed out that GM had failed to recall all of the vehicles with the defective ignition switches. The February 19, 2014 request for timeliness query also asked the NHTSA to investigate GM's failure to fulfill its legal obligation to report the safety-related defects in the Defective Vehicles to the NHTSA within five days of discovering the defect.

99. On February 24, 2014, New GM in a letter from Carmen Benavides, informed the NHTSA it was expanding the recall to include 2006-2007 model year (MY) Chevrolet I-EHR and Pontiac Solstice, 2003-2007 MY Saturn Ion, and 2007 MY Saturn Sky vehicles. GM included an Attachment to the February 24, 2014 letter. In the Attachment, New GM, **for the first time**, admitted that GM previously authorized a change in the ignition switch. Specifically, New GM stated:

On April 26, 2006, the GM design engineer responsible for the Cobalt's ignition switch signed a document approving changes to the ignition switch proposed by the supplier, Delphi Mechatronics. The approved changes included, among other things, the use of a new detent plunger and spring that increased torque force in the ignition switch. This change to the ignition switch was not reflected in a corresponding change in the part number for the ignition switch. GM believes that the supplier began providing the re-designed ignition switch to GM at some point during the 2007 model year. (GM's February 24, 2014 letter).

100. New GM then produced documents in response to Congressional requests leading up to the hearings on April 1 and 2, 2014. Among the documents produced by New GM is a document titled, "GENERAL MOTORS COMMODITY VALIDATION SIGN-OFF," dated April 26, 2006. According to this document, Delphi had met all of the sign-off requirements in

order to provide a new ignition switch for certain GM vehicles. New GM has acknowledged that the ignition switch in the Cobalt was included in this design change. The design change included a new detent plunger “to increase torque force in the switch.” DeGiorgio’s signature is on this page as the GM authorized engineer who signed off on this change to the ignition switch. This GM Commodity Validation Sign-Off shows that DeGiorgio repeatedly perjured himself during his deposition on April 29, 2013. DeGiorgio perjured himself in order to fraudulently conceal evidence from the Plaintiffs that GM had signed off on the change in the ignition switch so that the Plaintiffs, and ultimately a jury, would never know that GM was changing the switches in 2007 and later model year Cobalts and concealing these changes. DeGiorgio perjured himself when he signed the errata sheet confirming that all the testimony was true and accurate.

**F. The Named Plaintiffs’ Specific Experiences.**

101. The Named Plaintiffs incorporate each and every paragraph above as if fully set forth herein. Each of the Named Plaintiffs listed in Exhibit A assert a loss of vehicular control arising from an ignition switch defect of a GM vehicle resulting in the death and/or serious personal injuries of the Plaintiffs listed in Exhibit A.

**V. CLAIMS AGAINST GENERAL MOTORS, LLC BROUGHT BY ALL PLAINTIFFS LISTED IN EXHIBIT A**

**COUNT I – Negligence, Gross Negligence, Recklessness**

102. The Named Plaintiffs re-allege as if fully set forth, each and every allegation set forth herein.

103. Under the June 26, 2009 Amended and Restated Master Sale and Purchase Agreement wherein New GM acquired certain Old GM assets, New GM expressly assumed liability for post-sale accidents involving Old GM vehicles causing personal injury, loss of life or property damages. New GM also acquired knowledge of Old GM’s activities and the defective



ignition switch via the mind of the employees, officers, managers, books and records obtained and/or acquired as a result of the June 26, 2009 Amended and Restated Master Sale and Purchase Agreement and subsequent Sale Order. Thus, the duties of Old GM are part of the foundation for the liability assumed by New GM. Further, as identified therein, the Named Plaintiffs have claims for post-sale accidents involving Old GM vehicles that caused personal injury, loss of life or property damage and New GM is therefore expressly liable to the Named Plaintiffs.

104. Old GM and New GM owed Named Plaintiffs a duty to design, manufacture, fabricate, assemble, inspect, market, distribute, sell, and/or supply products in such a way as to avoid harm to persons using them such as Named Plaintiffs.

105. Old GM and New GM owed the Named Plaintiffs a duty to detect known safety defects in GM vehicles.

106. Old GM and New GM owed the Named Plaintiffs a duty, once it discovered the ignition switch defect, to provide thorough notice of the defect, including a warning that the defective vehicles should not be driven until an appropriate repair procedure is developed and performed.

107. Old GM and New GM owed the Named Plaintiffs a duty, once it discovered the ignition switch defect, to ensure that an appropriate repair procedure was developed and made available to drivers.

108. Old GM and New GM knew that their customers, such as the Named Plaintiffs, expect that the company will employ all reasonable efforts to detect safety defects, warn drivers of their existence, and develop and make available an appropriate repair procedure.

109. Old GM and New GM's efforts to discover, provide notice of, and provide repair procedures for safety related defects exist for the benefit of the Named Plaintiffs and other

drivers of GM vehicles. Old GM and New GM was aware that by providing maintenance and repair information and assistance, including through its authorized dealerships, Old GM and New GM had a responsibility to the Named Plaintiffs and other drivers to take the reasonable measures listed above.

110. By reason of New GM's assumption of liability under the June 26, 2009 Amended and Restated Master Sale and Purchase Agreement for post-sale accidents involving Old GM vehicles causing personal injury, loss of life or property damages, the failures of Old GM described above that contributed to or were causally connected to the injuries sustained by Named Plaintiffs were among the liabilities of Old GM assumed by New GM.

111. Independent of any failures by Old GM as described herein, between July 10, 2009 and March 2014, New GM breached its duties to the Named Plaintiffs by failing to provide appropriate notice of and repair procedures for the ignition switch defect in the Named Plaintiffs' vehicles. In doing so, New GM departed from the reasonable standard of care required of it.

112. It was foreseeable that if the New GM did not provide appropriate notice and repair procedures for the defect, the Named Plaintiffs and other drivers would be endangered.

113. The Named Plaintiffs' injuries were reasonably foreseeable to Old GM and New GM.

114. The Named Plaintiffs could not through the exercise of reasonable diligence have prevented the injuries caused by Old GM and New GM's negligence and gross negligence.

115. Old GM and New GM's acts and omissions, when viewed objectively from the actor's standpoint, involved an extreme degree of risk, considering the probability and magnitude of the potential harm to others. Old GM and New GM nevertheless proceeded with conscious indifference to the rights, safety and welfare of others.

**COUNT II - Fraud by Non Disclosure**

116. The Named Plaintiffs re-allege as if fully set forth, each and every allegation set forth herein.

117. As early as 2001, during pre-production development of the Saturn Ion, Old GM became aware of issues relating to the ignition switch “passlock” system. The 2001 report stated that the problem included a “low detent plunger force” in the ignition switch.

118. In 2003, before the launch of the 2005 Cobalt, Old GM became aware of incidents wherein the vehicle engine would suddenly lose power in the event the key moved out of the “run” position when the driver inadvertently contacted the key or steering column. An investigation was opened and, after consideration of lead-time required and the cost and effectiveness of potential solutions, the investigation was closed with no action taken.

119. As set forth above, from July 2009 to the present, New GM intentionally concealed or failed to disclose material facts from the Plaintiff, the public, and NHTSA

120. Additionally, from its inception in 2009, New GM possessed independent knowledge of the defects in the Named Plaintiffs’ vehicles and the need to undertake multiple design steps to resolve those defects to prevent injury and economic harm to vehicle owners such as Plaintiffs. This knowledge was based, in part, on the information from records, files, reports and other documents and materials regarding the defective ignition switch maintained by Old GM, all of which were included in the assets purchased by New GM during the bankruptcy sale.

121. Old GM had a duty to disclose the facts to the Named Plaintiffs and Old GM knew: (1) that the Named Plaintiffs were ignorant of the material facts that New GM did not disclose and/or intentionally concealed; and (2) the Named Plaintiffs did not have an equal opportunity to discover the material facts that New GM did not disclose and/or intentionally

concealed. Old GM's fraud, fraudulent concealment and fraudulent non-disclosure were all components of the subject incidents of the Named Plaintiffs. Because New GM expressly assumed liability for post-sale accidents causing personal injury, loss of life or property damages, New GM is liable to the Named Plaintiffs.

122. Specifically, under the June 26, 2009 Amended and Restated Master Sale and Purchase Agreement wherein New GM acquired certain Old GM assets, New GM expressly assumed liability for post-sale accidents involving Old GM vehicles causing personal injury, loss of life or property damages. New GM also acquired knowledge of Old GM's activities and the defective ignition switch via the mind of the employees, officers, managers, books and records obtained and/or acquired as a result of the June 26, 2009 Amended and Restated Master Sale and Purchase Agreement and subsequent Sale Order. Thus, the duties of Old GM are part of the foundation for the liability assumed by New GM. Further, as identified therein, the Named Plaintiffs have claims for post-sale accidents involving Old GM vehicles that caused personal injury, loss of life or property damage and New GM is therefore expressly liable to these Plaintiffs.

123. By reason of New GM's assumption of liability under the June 26, 2009 Amended and Restated Master Sale and Purchase Agreement for post-sale accidents involving Old GM vehicles causing personal injury, loss of life or property damage, the failures of Old GM described above that contributed to or were causally connected to the injuries sustained by Named Plaintiffs were among the liabilities of Old GM assumed by New GM. Independent of any failures by Old GM as described herein, between July 10, 2009 and March 2014, New GM breached its duties to the Named Plaintiffs by failing to disclose knowledge of the defective ignition switch to Named Plaintiffs.

124. New GM had a duty to disclose the facts to the Named Plaintiffs and New GM knew: (1) that the Named Plaintiffs were ignorant of the material facts that New GM did not disclose and/or intentionally concealed; and (2) the Named Plaintiffs did not have an equal opportunity to discover the material facts that New GM did not disclose and/or intentionally concealed.

125. By failing to disclose these material facts, New GM intended to induce the Named Plaintiffs to take some action or refrain from acting.

126. The Named Plaintiffs relied on New GM's non-disclosure and they were injured as a result of acting without knowledge of the undisclosed facts.

**COUNT IV – Strict Liability**

127. The Named Plaintiffs re-allege as if fully set forth, each and every allegation set forth herein.

128. Old GM and New GM, at all times relevant to this action, were engaged in the design, testing, manufacture, distribution, and sale of automobiles, including the subject automobile.

129. The subject automobiles were expected to and did reach users and consumers without substantial change in the condition in which it was sold.

130. The subject automobile was in a defective condition creating risk of harm to a user or a consumer, including Named Plaintiffs.

131. The defects set forth herein caused the Named Plaintiffs' injuries.

132. Under the June 26, 2009 Amended and Restated Master Sale and Purchase Agreement wherein New GM acquired certain Old GM assets, New GM expressly assumed liability for post-sale accidents involving Old GM vehicles causing personal injury, loss of life or

property damage. As identified therein, the Named Plaintiffs have claims for post-sale accidents involving Old GM vehicles that caused personal injury, loss of life or property damages and New GM is therefore expressly liable to these Plaintiffs.

133. These injuries and losses were caused by New GM's designing, manufacturing, fabricating, assembling, inspecting, marketing, distributing, selling and/or supplying the subject automobile in a defective condition for which it is strictly liable to the Named Plaintiffs pursuant to Restatement (Second) of Torts § 402A. Alternatively, the injuries and losses were caused by Old GM's designing, manufacturing, fabricating, assembling, inspecting, marketing, distributing, selling and/or supplying the subject automobile in a defective condition for which New GM is strictly liable to the Named Plaintiffs pursuant to Restatement (Second) of Torts § 402A because these liabilities were expressly assumed by New GM.

134. These injuries were caused by New GM's designing, manufacturing, fabricating, assembling, inspecting, marketing, distributing, selling and/or supplying the subject automobile without proper and adequate warnings, instructions, and/or guidelines for safe use for which it is strictly liable to the plaintiffs. Alternatively, these injuries were caused by Old GM's designing, manufacturing, fabricating, assembling, inspecting, marketing, distributing, selling and/or supplying the subject automobile without proper and adequate warnings, instructions, and/or guidelines for safe use for which New GM is strictly liable to the plaintiffs because these liabilities were expressly assumed by New GM.

135. By reason of New GM's assumption of liability under the June 26, 2009 Amended and Restated Master Sale and Purchase Agreement for post-sale accidents involving Old GM vehicles causing personal injury, loss of life or property damage, the failures of Old GM described above that contributed to or were causally connected to the injuries sustained by

Named Plaintiffs were among the liabilities of Old GM assumed by New GM. Independent of any failures by Old GM as described herein, between July 10, 2009 and March 2014, New GM breached its duties owed to the Named Plaintiffs as described herein.

**VI. DAMAGES**

135. The Named Plaintiffs pray for damages against the Defendant in a sum of money in excess of the jurisdictional amount of Seventy-Five Thousand Dollars (\$75,000.00) plus costs and any other such other relief to be deemed just and equitable to which they are entitled.

**VII. JURY DEMAND**

136. The Named Plaintiffs request a trial by jury.

**VIII. PRAYER**

For the foregoing reasons, Named Plaintiffs pray that the Defendant be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the each Plaintiff against Defendant for actual damages, as alleged, and exemplary damages; together with pre-judgment interest (from the date of injury through the date of judgment) at the maximum rate allowed by law; post-judgment interest at the legal rate, costs of court; and such other and further relief to which Named Plaintiffs may be entitled at law or in equity.

**Dated: October 10, 2014**

**Respectfully Submitted,**

**HILLIARD MUÑOZ GONZALES LLP**

By: 

Robert C. Hilliard

State Bar No. 09677700

Federal ID No. 5912

bobh@hmglawfirm.com

Rudy Gonzales, Jr.

State Bar No. 08121700

Federal ID No. 1896

rudyg@hmglawfirm.com



Catherine D. Tobin  
State Bar No. 24013642  
Federal ID No. 25316  
catherine@hmglawfirm.com  
Marion Reilly  
Texas Bar No. 24079195  
Federal ID No. 1357491  
marion@hmglawfirm.com

719 S. Shoreline Boulevard,  
Suite 500  
Corpus Christi, TX 78401  
Telephone No.: (361) 882-1612  
Facsimile No.: (361) 882-3015

-and-

Thomas J. Henry  
State Bar No. 09484210  
Federal ID No. 12980  
tjh@tjhlaw.com  
Curtis W. Fitzgerald, II  
State Bar No. 24012626  
Federal ID No. 24980  
cfitzgerald@tjhlaw.com

**THOMAS J. HENRY INJURY ATTORNEYS**  
521 Starr St.  
Corpus Christi, Texas 78401  
Telephone No.: (361) 985-0600  
Facsimile No.: (361) 985-0601

**ATTORNEYS FOR PLAINTIFFS**

# Exhibit A

No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court*
<b>Death</b>							
1	Fleck, Joseph Individually, and as Representative of the Estate of Teresa Fleck	121 Railroad St., Windber, Pennsylvania 15963 United States	2007 Pontiac G5	1G2AL15F477270174	11/9/12	Somerset, PA	Western District of Pennsylvania
2	Gutierrez, Laura Individually, and as Representative of the Estate of Manuela Reyes Gutierrez	2056 E. Howe Ave, Tempe, Arizona 85281 United States	2004 Chevy Malibu	1G1ZT52814F201142	7/1/12	Chihuahua, CH	District of Arizona
3	Gutierrez, Laura Individually, and as Representative of the Estate of Marina Granados	2056 E. Howe Ave, Tempe, Arizona 85281 United States	2004 Chevy Malibu	1G1ZT52814F201142	7/1/12	Chihuahua, CH	District of Arizona
4	Gutierrez, Laura Individually, and as Representative of the Estate of Remedio Gutierrez	2056 E. Howe Ave, Tempe, Arizona 85281 United States	2004 Chevy Malibu	1G1ZT52814F201142	7/1/12	Chihuahua, CH	District of Arizona
5	Harvey, Rory Individually, and as Representative of the Estate of Valeria Harvey	315 Washington St., Aliquippa, Pennsylvania 15001 United States	2005 Chevy Cobalt	1G1AK12F657604021	3/18/13	Aliquippa, PA	Western District of Pennsylvania
6	Heishman, Franklin Individually, and as Representative of the Estate of Martha Heishman	7733 Ripperdan Valley Road SW, Central, Indiana 47110 United States	2007 Chevy Cobalt	1G1AK18F367646770	9/30/11	Corydon, IN	Southern District of Indiana
7	Kirby, Charlotte Individually, and as Representative of the Estate of Rosalene Smith	1808 Kings Circle, Pell City, Alabama 35128 United States	2005 Chevy Cobalt	1G1AL12F057630241	1/8/12	Pell City, AL	Northern District of Alabama
8	Leveille, Kenneth Individually, and as Next Friend of Gavin Leveille, and as Representative of the Estate of Megan Cheyne McMurtrey	5355 Edmond Street, Apt 1033, Las Vegas, Nevada 89118 United States	2006 Chevy Cobalt	1G1A255F167766722	1/21/11	Lincoln County, NV	District of Nevada
9	McCleve, Julia Individually, and as Representative of the Estate of Amanda McCleve	436 N. Honeysuckle Ln., Gilbert, Arizona 85234 United States	2008 Pontiac Solstice	1G2M835B48Y106041	9/1/11	Camp Verde, AZ	District of Arizona
10	Storck, LeAnn Individually, and as Representative of the Estate of Donny Storck	W 5391 County Road O, Medford, Wisconsin 54451 United States	2007 Chevy Cobalt	1G1AL15F377294311	4/22/10	Medford, WI	Western District of Wisconsin
11	Vindiola, Cecilia Individually, and as Representative of the Estate of Jade Quintana	5900 Shiner Drive, Fort Worth, Texas 76179 United States	2006 Chevy Cobalt	1G1AP11P767803673	1/24/14	Arlington, TX	Northern District of Texas
<b>Injury</b>							
12	Adams, Donna	10811 Mount Verde Lane, Houston, Texas 77099 United States	2007 Chevy HHR	3GND13D875613254	3/27/14	Rosenberg, TX	Southern District of Texas
13	Adams, Shanika	4122 S. Dowfield Dr, Fayetteville, North Carolina 28311 United States	2007 Chevy Cobalt	1G1AK15F077151836	3/20/14	Fayetteville, NC	Eastern District of North Carolina
14	Allen, Rachel	1225 Tidewater Dr. Apt 124, Norfolk, Virginia 23504 United States	2008 Chevy Malibu	1G1AL15F477270700	3/3/12	Virginia Beach, VA	Eastern District of Virginia
15	Allen, Zach	13952 Northwest Meadowridge Dr., Portland, Oregon 97229 United States	2006 Saturn Ion	1G8A255P262185431	8/15/13	Portland, OR	District of Oregon
16	Amiker, Renell	2569 7th Ave Apt 12E, New York, New York 10039 United States	2004 Saturn Ion	1G8AG52F142116883	9/17/12	Manhattan, NY	Southern District of New York
17	Andzelik, Dolores	53 Beeno Rd., New Stanton, Pennsylvania 15672 United States	2008 Chevy Cobalt	1G1AL58F18273770	9/2/13	Greensburg, PA	Western District of Pennsylvania
18	Arroyos, Estevan	3605 Marion Lane, Las Cruces, New Mexico 88012 United States	2008 Pontiac G5	1G2AL18F287335665	4/20/13	Dona Ana, NM	District of New Mexico
19	Ayers, Darwin	84 Pine Way Rd., Romney, West Virginia 26757 United States	2005 Chevy Cobalt	1G1AK52F657546130	1/11/14	Romney, WV	Northern District of West Virginia
20	Badger, Patricia	PO Box 671, Fairfax, South Carolina 29827 United States	2009 Chevy HHR	3GNCA23B295605556	5/3/13	Walterburo, SC	District of South Carolina
21	Badger, Patricia Individually, and as Next Friend of Antonio Badger	PO Box 671, Fairfax, South Carolina 29827 United States	2009 Chevy HHR	3GNCA23B295605556	5/3/13	Walterburo, SC	District of South Carolina
22	Bailey, April Monique	922 State Street, Charlotte, North Carolina 28208 United States	2004 Chevy Impala	2G1WF2F52E149224753	3/7/14	Charlotte, NC	Western District of North Carolina
23	Bailey, Frances	HC 68 Box 934, Hanover, West Virginia 24839 United States	2006 Chevy Cobalt	1G1AK15F167840928	9/1/13	Hanover, WV	Southern District of West Virginia

\*Named Plaintiffs state that but for the Order permitting direct filing into the Southern District of New York, they would have filed in the district courts listed in this column.

No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
24	Bailey, Frances Individually, and as Next Friend of Whitney Bailey	HC 68 Box 934, Hanover, West Virginia 24839 United States	2006 Chevy Cobalt	1G1AK15F167840928	9/1/13	Hanover, WV	Southern District of West Virginia
25	Baisden, Rebecca	4611 W 43rd St, Cleveland, Ohio 44101 United States	2005 Saturn Ion	1G8AM12FX52182707	12/12/13	Alderson, WV	Southern District of West Virginia
26	Bauman, Kendra	1517 Mayflower Dr., Irving, Texas 785061 United States	2010 Chevy Cobalt	1G1AB5F53A7242426	3/15/14	Dallas, TX	Northern District of Texas
27	Bauman, Kendra Individually, and as Next Friend of Rori Banich	1517 Mayflower Dr., Irving, Texas 785061 United States	2010 Chevy Cobalt	1G1AB5F53A7242426	3/15/14	Dallas, TX	Northern District of Texas
28	Baumann, Hoang	36435 Iron Horse Drive, Palm Dale, California 93550 United States	2007 Saturn Sky	1M1BL1UG9C1575788	4/26/13	Los Angeles, CA	Central District of California
29	Beatty, Robert Individually, and as Next Friend of Mallory Paige Beatty	5909 Walla, Fort Worth, Texas 76133 United States	2006 Chevy Cobalt	1G1AM158467673200	1/7/14	Fort Worth, TX	Northern District of Texas
30	Beauchamp, Troy	1189 Desert Cove Drive, Pueblo, Colorado 81007 United States	2008 Chevy Cobalt	1G1AK58F687304658	4/25/14	Pueblo, CO	District of Colorado
31	Beckemeyer, Shannon	517 Marquis Ave., Centralia, Illinois 62801 United States	2008 Buick Enclave	5GAEV23778J131672	4/2/12	Salem, IL	Southern District of Illinois
32	Becker, Holly	PO Box 1024, Marshalls Creek, Pennsylvania 18335 United States	2005 Chevy Cobalt	1G1AL125557661257	12/20/13	East Stroudsburg, PA	Middle District of Pennsylvania
33	Bladen, Bernard	506 Stewart Avenue, Glen Burnie, Maryland 21061 United States	2003 Saturn Ion	1G8AG52F43Z106363	8/21/12	Severn, MD	District of Maryland
34	Blankenbaker, Rachael	509 Grandview Dr. # 136, Salem, Indiana 47167 United States	2007 Pontiac Solstice	1G2MB35B27Y111432	9/8/13	Fort Pierce, FL	Southern District of Florida
35	Blevins, Jason	40 County Road 686, Higson, Alabama 35979 United States	2007 Chevy HHR	3GNDA33P075517124	5/18/13	Bridgeport, AL	Northern District of Alabama
36	Borozzi, Vitoria	1020 Evans Way, Baltimore, Maryland 21205 United States	2005 Chevy Cobalt	1G1AL52F2657551998	11/9/13	Baltimore, MD	District of Maryland
37	Bosarge, Charles	8331 Whip O Will Lane, Irvington, Alabama 36544 United States	2007 Chevy HHR	3GNDA13D275620376	3/17/14	Gulfport, MS	Southern District of Mississippi
38	Bost, Frances	630 Pugsley Ave. Apt 12H, Bronx, New York 10473 United States	2006 Saturn Ion	1G8AL58F16Z196675	9/9/13	Bronx, NY	Southern District of New York
39	Boyland, Robert	522 Fairways Drive, Titusville, Florida 32780 United States	2008 Chevy HHR	3GNDA13D385546810	11/15/11	Titusville, FL	Middle District of Florida
40	Bradley, Marva	12000 Wanda Ave. Apt. 939, Cleveland, Ohio 44135 United States	2006 Chevy Cobalt	1G1AK15F167831887	3/8/14	Cleveland, OH	Northern District of Ohio
41	Bradley, Wanda	324 Leisure Cir., Pine Mountain, Georgia 31822 United States	2004 Saturn Ion	1G8AJ52F04Z211145	11/18/13	Lagrange, GA	Northern District of Georgia
42	Briggs, Sidney	236 N 5th Ave., Oakdale, California 95361 United States	2006 Pontiac Solstice	1G2mb35bx6y117493	1/25/14	Oakdale, CA	Eastern District of California
43	Brown, Audra	4828 Luella Ave., North Charleston, South Carolina 29405 United States	2009 Chevy HHR	3GNCA13B295539441	11/1/11	North Charleston, SC	District of South Carolina
44	Brown, Candice	12334 Boncrest Drive, Reisterstown, Maryland 21136 United States	2006 Chevy Cobalt	1G1AK15FX67645698	3/24/14	Baltimore, MD	District of Maryland
45	Brown, Eric	3987 Partmouth Lane, Santa Maria, California 93455 United States	2013 Chevy Camaro	2G1FE1E34D9173884	9/8/13	Santa Barbara, CA	Central District of California
46	Brown, Jessica	205 Circle Hill Drive, Brandon, Florida 33510 United States	2003 Saturn Ion	1G8AN12F63Z179670	7/3/12	Brandon, FL	Middle District of Florida

No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
47	Brown, Manuel	902 Magnolia St., Refugio, Texas 78377 United States	2013 Chevy Impala	2G1WA5EK181118444	5/1/13	Corpus Christi, TX	Southern District of Texas
48	Brown, Scott	P.O. BOX 1793, Bucksport, Maine 04416 United States	2006 Saturn Ion	1G8AJ58F46Z110281	5/23/13	Hollywood, FL	Southern District of Florida
49	Brown, Travarion B	806 W Canyon Court, Montgomery, Alabama 36110 United States	2007 Chevy Cobalt	1G1AK55F477107636	5/15/13	Prattville, AL	Middle District of Alabama
50	Brummitt, Kenneth	4502 Estate Blvd. Apt. 12, Indianapolis, Indiana 46221 United States	2007 Chevy HHR	3GNDA23D975508535	6/3/11	Geneva, OH	Northern District of Ohio
51	Bucher, Patrick	PO BOX 473683, Aurora, Colorado 80047 United States	2004 Saturn Ion	1G8AM12F14Z131180	12/9/13	Denver, CO	District of Colorado
52	Burns, Orlando	11069 Silver Aspen Court, Hampton, Georgia 30228 United States	2003 Saturn Ion	1G8AJ52F23Z142649	9/15/13	Jones Burrow, GA	Northern District of Georgia
53	Bustillos, Esperanza	2113 Chelwood Park Blvd NE Apt A, Albuquerque, New Mexico 87112 United States	2008 Chevrolet Cobalt	1G1AL18F087121293	6/6/13	Rio Rancho, NM	District of New Mexico
54	Callis, Nathaniel	10651 E Street Bldg H100, Corpus Christi, Texas 78419 United States	2007 Chevy Cobalt	1G1AL15F9771282	7/4/12	Chouteau, OK	Northern District of Oklahoma
55	Carpenter, Deborah	P.O. Box 802, Cushing, Texas 75760 United States	2010 Chevy Cobalt	1G1AF55XA7238197	5/1/13	Nacogdoches, TX	Eastern District of Texas
56	Carpenter, Taylor	3203 Autumn Lane, San Antonio, Texas 78219 United States	2004 Saturn Ion	108AJ52554Z102308	6/25/14	San Antonio, TX	Western District of Texas
57	Carter-Taylor, Melinda	PO Box 384, Adrian, Missouri 64720 United States	2006 Saturn Ion	1G8AM15F06Z186147	7/27/12	Lee's Summit, MO	Western District of Missouri
58	Catone, Joseph	4620 Logan Way, Hubbard, Ohio 44425 United States	2007 Saturn Ion	1G8AJ55F87Z127834	4/3/14	Youngstown, OH	Northern District of Ohio
59	Cepero-Wisher, Monique	183 Vaughn Rd., Athens, Georgia 30606 United States	2006 Chevy Cobalt	1G1AK55F26718828	2/21/14	Athens, GA	Middle District of Georgia
60	Chidester, Tracy	120 Tressler Dr., Confluence, Pennsylvania 15424 United States	2007 Chevy HHR	3GNDA13D975566381	12/20/12	Turkeyfoot, PA	Western District of Pennsylvania
61	Claxton, Sharon	2250 Tolbert Rd., Hamilton, Ohio 45011 United States	2006 Chevy HHR	3GNDA23P665572136	8/2/10	Liberty, OH	Northern District of Ohio
62	Cochran, Alvie	P.O. Box 853, North Tazewell, Virginia 24630 United States	2007 Chevy HHR	3GNDA33P275543627	6/6/12	North Tazewell, VA	Western District of Virginia
63	Cockram, Stephanie	395 Mountain View Church Rd., Patrick Springs, Virginia 24133 United States	2006 Chevy Cobalt	1G1AK15FX67742545	6/28/11	Patrick Springs, VA	Eastern District of Virginia
64	Cohen, Kelly	508 Pincus Ave., North Field, New Jersey 08225 United States	2008 Chevy Equinox	2cnd13f986330653	4/5/14	Pleasant Ville, NJ	District of New Jersey
65	Covington, Tangela	406 Friddle Drive, High Point, North Carolina 27260 United States	2006 Saturn Ion	1G8AJ55F36Z111751	12/18/11	Greensboro, NC	Middle District of North Carolina
66	Craddock, Veronica	233 E. 7th St, Newport, Kentucky 41071 United States	2003 Saturn Ion	1G8AJ52F43Z111855	9/1/11	Cincinnati, OH	Southern District of Ohio
67	Craig, Maria	105 Aspen Dr., Birmingham, Alabama 35209 United States	2010 Chevy Cobalt	1G1AD5F57A7170074	9/26/12	Homewood, AL	Northern District of Alabama
68	Crook, Reubena	P.O. Box 1051, Point Clear, Alabama 36564 United States	2007 Saturn Sky	1G8MB35B47Y101541	12/9/13	Fairhope, AL	Southern District of Alabama
69	Crutcher, Ethel	6824 Radford Ave Apt 3, North Hollywood, California 91605 United States	2005 Chevy Cobalt	1G1AK552F357604310	2/25/14	North Hollywood, CA	Central District of California

No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
70	Cullum, Amy	C/O Wallace Regan 211 Orchard Dr, Shelbyville, Tennessee 37160 United States	2005 Chevy Cobalt	1G1AL14FX57611239	2/8/14	Estill Springs, TN	Eastern District of Tennessee
71	Cullum, Amy Individually, and as Next Friend of Alexandria Regan-Laye	C/O Wallace Regan 211 Orchard Dr, Shelbyville, Tennessee 37160 United States	2005 Chevy Cobalt	1G1AL14FX57611239	2/8/14	Franklin County, TN	Eastern District of Tennessee
72	Culpepper, Dontalisha	316 North 46th St. Apt. 3, Belleville, Illinois 62226 United States	2006 Chevy HHR	3GNDA23P865502542	4/19/14	Belleville, IL	Southern District of Illinois
73	Cyrus, Taren	319 W. 15 Ave., Homestead, Pennsylvania 15120 United States	2007 Chevy Cobalt	1G1AK55FX77387126	8/31/13	Pittsburgh, PA	Western District of Pennsylvania
74	Danforth, Kenneth L.	18100 Coker Rd. Trlr 36, Shawnee, Oklahoma 74801 United States	2007 Chevy HHR	3GNDA23DX75587021	4/3/14	Bethel Acres, OK	Western District of Oklahoma
75	Davis, Donda	537 Iroquois, Dr., Birmingham, Alabama 35214 United States	2011 Chevy Impala	2G1WGS5EKXB1290650	10/10/12	Homewood, AL	Northern District of Alabama
76	Davis, Ken	5954 State Route 505, Georgetown, Ohio 45121 United States	2006 Chevy HHR	3GNDA23P265635717	2/14/14	Bethel, OH	Southern District of Ohio
77	Davis Jr, Timothy A Individually, and as Next Friend of Jaylen Isiah Davis	922 State Street, Charlotte, North Carolina 28208 United States	2004 Chevy Impala	2G1WF2F52E149224753	3/7/14	Charlotte, NC	Western District of North Carolina
78	Davis Jr., Timothy A	922 State Street, Charlotte, North Carolina 28208 United States	2004 Chevy Impala	2G1WF2F52E149224753	3/7/14	Charlotte, NC	Western District of North Carolina
79	Davison, McDexturie	11710 Murr Way, Houston, Texas 77048 United States	2008 Chevy Cobalt	1g1ak58f887115686	3/15/14	Houston, TX	Southern District of Texas
80	Degree, Latifah	2512 Blacksburg Road Unit 17, Grover, North Carolina 28073 United States	2006 Chevy Cobalt	1g1ak55f767797977	3/14/14	Shelby, NC	Western District of North Carolina
81	Dennis, April Individually, and as Next Friend of Dinasia Dennis	2357 Knott Street, Macon, Georgia 31201 United States	2006 Chevy Cobalt	1G1AK55F077295362	4/16/12	Atlanta, GA	Northern District of Georgia
82	Dennis, April Individually, and as Next Friend of Rickelle Glenn	2357 Knott Street, Macon, Georgia 31201 United States	2006 Chevy Cobalt	1G1AK55F077295362	4/16/12	Atlanta, GA	Northern District of Georgia
83	Dor, Gabriel	P.O. Box 6136, Lakeworth, Florida 33466 United States	2008 Chevy Malibu	1G1ZG57B484240981	9/17/13	Lauderdale Lakes, FL	Southern District of Florida
84	Downes, Misty	3196 Cedar court, Placerville, California 95667 United States	2006 Saturn Ion	1G8AJ55F86Z154935	4/13/13	Placerville, CA	Eastern District of California
85	Drury, Candace	1080 Cayer Drive, Glen Burnie, Maryland 21061 United States	2004 Saturn Ion	1G8AJ52F84Z125808	2/15/13	Glen Burnie, MD	District of Maryland
86	Dumas, Alberta	5706 Skyland Drive, Forest Park, Georgia 30297 United States	2006 Saturn Ion	1G8A155FX6Z155892	1/24/14	Decatur, GA	Northern District of Georgia
87	Dupervil, Reginald	21 Staples Ave, Everett, Massachusetts 02149 United States	2008 Chevy Malibu	1G1ZG57B484240981	9/17/13	Ft Lauderdale, FL	Southern District of Florida
88	Durham, Carl	111 Roxberry Dr., Harvis, Alabama 35749 United States	2006 Chevy HHR	3GNDA23P965528647	7/24/10	Madison, AL	Northern District of Alabama
89	Durham, Lauren	202 Rindon Lane, Hazel Green, Alabama 35750 United States	2006 Chevy HHR	3GNDA23P965528647	7/24/10	Madison, AL	Northern District of Alabama
90	Dyer, Tonya	17 Belmar Drive, Little Rock, Arkansas 72209 United States	2006 Saturn Ion	1G8AJ55F06Z190957	4/1/14	Little Rock, AR	Eastern District of Arkansas
91	Elder, Bobbie Jean	112 Ledger St., Buffalo, New York 14216 United States	2007 Chevy Cobalt	1G1AK15F377204920	4/9/14	Buffalo, NY	Western District of New York
92	Elder, Bobbie Jean Individually, and as Next Friend of Robert Elder	112 Ledger St., Buffalo, New York 14216 United States	2007 Chevy Cobalt	1G1AK15F377204920	4/9/14	Buffalo, NY	Western District of New York

No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
93	Farhan, Mohammad	102-39 88th Street, Ozone Park, New York 11416 United States	2006 Chevy Cobalt	1G1AL58F687147629	11/12/13	Muenster, TX	Eastern District of Texas
94	Feagin, Lynda	5460 Janet Ave., St. Louis, Missouri 63136 United States	2004 Saturn Ion	1G8AF52F142104610	4/11/10	St. Louis, MO	Eastern District of Missouri
95	Fearn, Ann	1181 West 1600 N. #4, Layton, Utah 84041 United States	2007 Chevy Cobalt	1G1AL15F577220906	10/27/13	Morgan, UT	District of Utah
96	Field, Judith	40 Windtree Ct., Travelers Rest, South Carolina 29690 United States	2004 Saturn Ion	1G8AJ52F542209942	2/17/14	Greenville, SC	District of South Carolina
97	Fish, Mariah L	12761 SW 133 Rd Ave, Tigard, Oregon 97223 United States	2006 Saturn Ion	1G8AZ55P26Z185431	8/15/13	Portland, OR	District of Oregon
98	Fleming, Courtney	11910 Orsinger lane Apt 812, San Antonio, Texas 78230 United States	2006 Chevy Impala	2G1WB55K069363661	8/10/10	San Antonio, TX	Western District of Texas
99	Fleming, Danny	213 J.H. Aldridge Drive, Juliette, Georgia 31046 United States	2007 Chevy Cobalt	1g1ak15f97712j820	5/1/13	Juliette, GA	Middle District of Georgia
100	Frie, Samantha	277 N. Main St., Wilkes Barre, Pennsylvania 18702 United States	2007 Chevy Cobalt	1G1AL55F877193532	3/13/14	Hanover Township, PA	Eastern District of Pennsylvania
101	Fryman, Zachary	2335 Alexandria Pike, Southgate, Kentucky 41071 United States	2005 Chevy Cobalt	1G1AL545757602912	3/3/14	Southgate, KY	Eastern District of Kentucky
102	Garcia, Ina	P.O. Box 212, Commerce, Colorado 80022 United States	2006 Chevy Cobalt	1G1AK55F667772858	7/4/12	Brighton, CO	District of Colorado
103	Garner, Michael	10233 White Water Lilyway, Boynton Beach, Florida 33436 United States	2007 Cadillac DTS	1G6KD579674160582	8/10/14	Miami Beach, FL	Southern District of Florida
104	Garza, Wanda	23440 Owen Ave., Ducor, California 93218 United States	2005 Chevy Cobalt	1G1AK52F557571441	3/16/13	Porterville, CA	Eastern District of California
105	Genus, Simone	6217 47th Ave. E, Bradenton, Florida 34203 United States	2007 Pontiac G5	1G2AL15F377274443	6/18/13	Stone Mountain, GA	Northern District of Georgia
106	Gibson, Teresa	427 West Paradise St., Orrville, Ohio 44667 United States	2005 Chevy Cobalt	1G1AK12FX57623123	1/10/14	Orrville, OH	Northern District of Ohio
107	Glosson, Sylvia Jones	124 Woodbury Rd., Burlington, Vermont 05408 United States	2007 Chevy Cobalt	1G1AK55F977410900	5/1/10	Boston, MA	District of Massachusetts
108	Gonzales, Isabel	18308 Rivertimber Dr, Del Valle, Texas 78617 United States	2006 Saturn Ion	1G8AJ55F86A209199	6/24/13	Austin, TX	Western District of Texas
109	Gonzales, Isabel Individually, and as Next Friend of Frances Janie Quintero	18308 Rivertimber Dr, Del Valle, Texas 78617 United States	2006 Saturn Ion	1G8AJ55F86A209199	6/24/13	Austin, TX	Western District of Texas
110	Gonzalez, Yasmi	3280 Azteca Trail, El Paso, Texas 79938 United States	2006 Chevy Cobalt	1G1AL15S967656043	4/1/14	El Paso, TX	Western District of Texas
111	Gordon, Debora	2609 Featherstone Rd. Apt. #162, Oklahoma City, Oklahoma 73120 United States	2006 Pontiac Solstice	1G2MB35B76Y114583	9/22/11	Oklahoma City, OK	Western District of Oklahoma
112	Grant, Helen	1177 FM 318, Hallettsville, Texas 77964 United States	2006 Saturn Ion	1G8AJ55F96Z136966	2/28/14	Hallettsville, TX	Southern District of Texas
113	Graves, Patricia	504 1st Ave., Satsuma, Florida 32189 United States	2007 Chevy HHR	3GNDA23P275592918	10/5/09	Wildwood, FL	Middle District of Florida
114	Gray, Samantha	1032 Oak St. Apt. B4, Scott City, Missouri 63780 United States	2010 Chevy HHR	3GNB8BD87A5582399	7/24/14	Scott City, MO	Eastern District of Missouri
115	Groves, Aaron	4920 Falcon Nest Place Apt 107, Hampton, Virginia 23666 United States	2009 Chevy Cobalt	1G1AL18H897211830	9/30/13	James City County, VA	Eastern District of Virginia



No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
116	Gulley, Laquinta	152 Blackberry Creek Dr, Carrollton, Georgia 30116 United States	2007 Chevy Cobalt	1G1AK55F87321870	11/13/13	Carrollton, GA	Northern District of Georgia
117	Gutierrez, Laura	2056 E. Howe Ave, Tempe, Arizona 85281 United States	2004 Chevy Malibu	1G1ZT52814F201142	7/1/12	Chihuahua, CH	District of Arizona
118	Hagan, Fanchea	225 Milk Barn Lane, Cookeville, Tennessee 38506 United States	2004 Chevy Malibu	1G1ZU64884F150545	4/29/13	Abington, PA	Eastern District of Pennsylvania
119	Hammonds, Tonia	3204 Currie St., Apt. 703, Fort Worth, Texas 76113 United States	2004 Saturn Ion	1G8AC12F742212814	12/10/13	Fort Worth, TX	Northern District of Texas
120	Hancock, James	P.O. Box 430877, Houston, Texas 77243 United States	2006 Chevy HHR	3GNDA23P16S584257	1/31/14	Houston, TX	Southern District of Texas
121	Hannah, Amanda	PO Box 392, Ragland, West Virginia 25690 United States	2008 Pontiac G5	1G2AL18F687337094	3/31/13	South Williamson, KY	Eastern District of Kentucky
122	Harris, Diane E.	P.O. Box 68585, Jackson, Mississippi 39286 United States	2007 Saturn Ion	1G8AJ55F172142658	1/1/12	Madison, MS	Southern District of Mississippi
123	Harrison, Jabrittny	314 Harwell Ave Apt 4, Lagrange, Georgia 30240 United States	2007 Chevy Cobalt	1G1AK55FX77121640	12/18/12	LaGrange, GA	Northern District of Georgia
124	Hatten, Willie Sr.	36 Windsor Ct., Laurel, Mississippi 39443 United States	2009 Chevy Cobalt	1g1a158f487321892	11/23/13	Laurel, MS	Southern District of Mississippi
125	Haydt, Michael	25 Markley Drive **Prisoner, York Haven, Pennsylvania 17370 United States	2003 Saturn Ion	1G8AW12F13Z175930	5/16/14	Goldsboro, PA	Middle District of Pennsylvania
126	Head, Lakendra	2614 Matthews St, Newberry, South Carolina 29108 United States	2004 Saturn Ion	1G8AL52F34Z120557	6/10/14	Greenville, SC	District of South Carolina
127	Hellerman, Wayne	P.O. Box 118, Stillwater, Minnesota 55082 United States	2009 Pontiac Vibe	5Y2SL65868Z406681	10/29/11	Dickinson, KS	District of Kansas
128	Hellstrom, Kerry	1824 Roman Ave., Camarillo, California 93010 United States	2006 Saturn Ion	1G8AJ55F76Z100199	4/25/14	Camarillo, CA	Central District of California
129	Hemphill, Janet	2035 Lakeshore Dr., Port Arthur, Texas 77640 United States	2007 Chevy Cobalt	1G1AK15F077264685	5/1/13	Port Arthur, TX	Eastern District of Texas
130	Henderson, Rasbee	P.O. Box 70, Georgetown, South Carolina 29442 United States	2006 Chevy Cobalt	1G1AK55F967815726	7/26/12	Georgetown, SC	District of South Carolina
131	Herd, Alexander	7507 Ruby Linder Road, Waxhaw, North Carolina 28173 United States	2006 Saturn Ion	1g8aj55f66z149104	10/11/13	Shelby, NC	Western District of North Carolina
132	Hicks, Dominique	10021 W Fond Du Lac Ave Apt. 5, Milwaukee, Wisconsin 53224 United States	2010 Chevy Cobalt	1G2ZG57B094137313	4/4/14	Waukesha, WI	Eastern District of Wisconsin
133	Hill, Ashley	17 Trafalgar Square, Birmingham, Alabama 35215 United States	2007 Chevy Cobalt	1G1AL15F777112027	12/12/13	Trussville, AL	Northern District of Alabama
134	Hill, Rebecca	301 Randall Dr., Clinton, South Carolina 29325 United States	2003 Saturn Ion	1G8AZ52F63Z168812	2/22/14	Clinton, SC	District of South Carolina
135	Hoffman, Corey	2000 Idaho St., Evansdale, Iowa 50707 United States	2005 Chevy Cobalt	1G1AL12F857553487	11/29/13	Waterloo, IA	Northern District of Iowa
136	Hope, Christopher	1420 Richbay East, Arnold, Maryland 21012 United States	2006 Chevy Cobalt	1G1AP14P967626264	4/10/14	Baltimore, MD	District of Maryland
137	Horne, Janay	P.O. Box 722, Snow Hill, North Carolina 28580 United States	2008 Pontiac G6	1G2ZH57N784275792	5/4/14	Snow Hill, NC	Eastern District of North Carolina
138	Houston, Patricia	433 Cockerell Dr., Abilene, Texas 79602 United States	2004 Saturn Ion	1G8AJ52F24Z157511	10/5/13	Abilene, TX	Northern District of Texas



No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
139	Hughes, Katherine	7598 HWY 62 W, Beaverdam, Kentucky 42320 United States	2007 Chevy Malibu Maxx	1G1ZT68N97F116220	9/20/09	Beaver Dam, KY	Western District of Kentucky
140	Jackson, Calvin	2614 Matthew St, Greenville, South Carolina 29108 United States	2004 Saturn Ion	1G8AL52F34Z120557	6/10/14	Greenville, SC	District of South Carolina
141	Jarrell, Barbara	2101 W Anderson Lane Apt. 413, Austin, Texas 78757 United States	2005 Saturn Ion	1G8AJ52F75Z167694	7/26/14	Austin, TX	Western District of Texas
142	Jasper, Kathy	8976 South 650 West, Milroy, Indiana 46156 United States	2004 Chevy Aveo	KL1TJ626X4B170866	4/11/14	Milroy, IN	Southern District of Indiana
143	Jeffrey, Joyce	1032 West Garfield St, Wynne, Arkansas 72396 United States	2007 Chevy Cobalt	1G1AK55F677337789	2/11/14	Wynne, AR	Eastern District of Arkansas
144	Jenkins, Carla	545 County Rd 11 North, Arlington, Alabama 36722 United States	2007 Chevy Cobalt	1G1AL55F7269449	4/1/13	Magnolia, AL	Southern District of Alabama
145	Johnson, Maurice	6705 Oak Dr, Alexandria, Virginia 22306 United States	2000 Cadillac DeVille	1G6KD54Y7YU308784	10/25/13	Washington, DC	District of Columbia
146	Johnson, Scott	100 Cherry St. #1302, Tomball, Texas 77375 United States	2007 Chevy Cobalt	1G1AL15F867751175	4/9/13	Magnolia, TX	Southern District of Texas
147	Johnson, Tyler	656 Sunset View Dr, Akron, Ohio 44320 United States	2006 Pontiac G6	1G2ZG528154173775	7/5/13	Akron, OH	Northern District of Ohio
148	Johnson, Vivian	6136 Firetower Rd, Kiln, Mississippi 39556 United States	2007 Chevy Cobalt	1G1AL55FX77416573	6/21/13	Pass Christian, MS	Southern District of Mississippi
149	Jones, Rachel	104 Wilson St., Havre De Grace, Maryland 21078 United States	2005 Chevy Cobalt	1G1AL52F457512622	10/15/13	Baltimore City, MD	District of Maryland
150	Josie, Cathy	40416 218th Avenue SE, Enumclaw, Washington 98022 United States	2006 Pontiac Solstice	1G2MB33B86Y104311	7/9/13	Enumclaw, WA	Western District of Washington
151	Josie, Richard	40416 218th Avenue, SE, Enumclaw, Washington 98022 United States	2006 Pontiac Solstice	1G2MB33B86Y104311	7/9/13	Enumclaw, WA	Western District of Washington
152	King, Perry	1208 South Belt Highway, St. Joseph, Missouri 64507 United States	2006 Chevy HHR	3GNDA13DC65511431	2/10/14	St Joseph, MO	Western District of Missouri
153	Kinney Jr., Darrell	1101 Braden Ct., Waukee, Iowa 50263 United States	2006 Chevy HHR	3GNDA23D765639610	3/9/12	Waukee, IA	Southern District of Iowa
154	Kirika, Loveth	11755 South Lake Drive, Apt. 3507, Houston, Texas 77077 United States	2007 Chevy HHR	4T1BB46K170028861	4/12/14	Galveston, TX	Southern District of Texas
155	Klukaczynski, Elizabeth	812 W. Peru St., Princeton, Illinois 61356 United States	2006 Chevy Cobalt	1G1AK55F667655451	2/20/14	Henry, IL	Central District of Illinois
156	Lambert, Jerry	19794 N State Hwy 78, Canton, Illinois 61520 United States	2004 Saturn Ion	1G8AJ52F24Z187687	9/15/12	St Petersburg, IL	Central District of Illinois
157	Landrigan, Joshua	17 McMahan Cutoff Road, Sumrall, Mississippi 39482 United States	2006 Chevy Cobalt	1G1AK55F667820200	8/18/13	Purvis, MS	Southern District of Mississippi
158	Lane, Breeanna	284 West Bluff Ave., Fresno, California 93711 United States	2010 Chevy Cobalt	1G1AK58F987274765	6/25/13	Marina Del Rey, CA	Central District of California
159	Lankford, Christina	1443 Capipola Circle, Stockton, California 95206 United States	2008 Chevy HHR	3GNDA53PX8S610925	9/10/13	Stockton, CA	Eastern District of California
160	Lawrence, Dillon	2816 S. Winsted Way, West Valley City, Utah 84420 United States	2005 Chevy Cobalt	1G1AP14P157639072	12/30/13	West Valley, UT	District of Utah
161	Lee, Cayce	730 Nola Rd, Sontag, Mississippi 39665 United States	2005 Chevy Cobalt	1G1AK52F157622983	10/20/09	Lorman, MS	Southern District of Mississippi

No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
162	Lee, Dixie	2852 Hampton Cove Way, Huntsville, Alabama 35763 United States	2008 Pontiac Solstice	1G2MC35BX8Y114657	10/18/13	Huntsville, AL	Northern District of Alabama
163	Legg, Tammy	5011 Goodnow Rd. Apt. C, Baltimore, Maryland 21206 United States	2008 Chevy Cobalt	1g1a158f887229572	1/25/14	Baltimore, MD	District of Maryland
164	Lewis, Delores	2202 Cherry Ridge Dr., Plainfield, Illinois 60586 United States	2006 Chevy Cobalt	1G1AK55F067605945	10/4/12	St. Louis, MO	Eastern District of Missouri
165	Lewis, Jameka	3353 Idlewild Dr, Chattanooga, Tennessee 37411 United States	2006 Chevy Cobalt	1G1AK15F967603880	12/25/13	Winchester, TN	Eastern District of Tennessee
166	Licht, Donald	68 Edan St., Buffalo, New York 14220 United States	2007 Chevy HHR	3GNDA33P375566981	10/21/13	Irving, NY	Western District of New York
167	Lingard, Vernado	P.O. Box 671, Fairfax, South Carolina 29827 United States	2009 Chevy HHR	3GNCA23B295605556	5/3/13	Walterboro, SC	District of South Carolina
168	Lothar, Letonya	5150 Biscayne Avenue Apartment 13, Racine, Wisconsin 53406 United States	2010 Chevy Cobalt	1G1AF5F58A7191137	1/20/12	Blanchardville, WI	Western District of Wisconsin
169	Lozoya, Luis	112 Harbour Town Dr., Montgomery, Texas 77356 United States	2006 Chevy Cobalt	1G1AP11P267716022	9/25/13	Montgomery, TX	Southern District of Texas
170	Lyons, Dallas Lee	10300 Lake Wheeler Rd., Fuquay Varina, North Carolina 27526 United States	2005 Saturn Ion	1G8AG52F75Z154054	4/21/14	Greensboro, NC	Middle District of North Carolina
171	Mabry, Braggie	1564 Harrington Rd Apt. 6134, Lawrenceville, Georgia 30043 United States	2005 Saturn Ion	1G8AJ52F85Z138981	3/21/12	Middletown, OH	Southern District of Ohio
172	Mabry, Steven O.	1564 Harrington Rd Apt 6134, Lawrenceville, Georgia 30043 United States	2005 Saturn Ion	1G8AJ52F85Z138981	3/21/12	Middletown, OH	Southern District of Ohio
173	Mack, Kelli W.	2094 Palmer Rd, Three Rivers, Massachusetts 01080 United States	2005 Chevy Cobalt	1G1AK52F357550037	6/29/13	Grafton, MA	District of Massachusetts
174	Maddocks, Jenna	P. O. Box 1793, Bucksport, Maine 04416 United States	2006 Saturn Ion	1G8AJ58F46Z110281	5/23/13	Hollywood, FL	Southern District of Florida
175	Maestas, Phyllis	2110 Camino Polvoso, Santa Fe, New Mexico 87507 United States	2007 Chevy Cobalt	1G1AL55F777415011	6/1/14	Santa Fe, NM	District of New Mexico
176	Mahoney, Sandi Individually, and as Next Friend of Brodi Mahoney	12700 Ridgemont Dr., Oklahoma City, Oklahoma 71365 United States	2011 Chevy HHR	3GNBACFU9B5659134	8/26/13	Oklahoma City, OK	Western District of Oklahoma
177	Mahoney, Sandi Individually, and as Next Friend of Brylei Mahoney	12700 Ridgemont Dr., Oklahoma City, Oklahoma 71365 United States	2011 Chevy HHR	3GNBACFU9B5659134	8/26/13	Oklahoma City, OK	Western District of Oklahoma
178	Mahoney, Sandi Individually, and as Next Friend of Serenity Yocum	12700 Ridgemont Dr., Oklahoma City, Oklahoma 71365 United States	2011 Chevy HHR	3GNBACFU9B5659134	8/26/13	Oklahoma City, OK	Western District of Oklahoma
179	Manassa, Kajuana	2400 Deerfield Dr. Apt 2B, North Port, Alabama 35473 United States	2006 Saturn Ion	1G8AJ55F86Z137343	4/16/14	Tuscaloosa, AL	Northern District of Alabama
180	Margolin, Jerome	75 Berkeley Avenue, Yonkers, New York 10705 United States	2009 Buick Lucerne	1G4HP57129U119843	2/11/14	Yonkers, NY	Southern District of New York
181	Margolin, Joe	10032 Cranbrook Falls, Las Vegas, Nevada 89148 United States	2005 Saturn Ion	1G8AJ52F95Z170743	7/1/13	Las Vegas, NV	District of Nevada
182	Markwell, Heather	1423 Hadwick Dr. Apt J, Baltimore, Maryland 21221 United States	2007 Pontiac G5	1G2ALISF877367670	4/25/12	Essex, MD	District of Maryland
183	Marshall, Ceretinia	2511 Pendleton, Columbia, South Carolina 29205 United States	2006 Saturn Ion	1G8AJ55F36Z161601	12/10/13	Columbia, SC	District of South Carolina
184	Martin, Brittani	316 Columbia Drive Apt 322C, Carrollton, Georgia 30117 United States	2005 Chevy Cobalt	1G1ALS2F657501914	12/21/12	Carrollton, GA	Northern District of Georgia

No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
185	Martin, Cathy	8 Private Road 22244, Cleveland, Texas 77327 United States	2011 Chevy HHR	3GNB8BFW5B5628703	11/19/13	Cleveland, TX	Eastern District of Texas
186	Martin, Patricia	24784 State Hwy AB, Essex, Missouri 63846 United States	2008 Chevy Cobalt	1G1AM18B487220290	3/27/14	Essex, MO	Eastern District of Missouri
187	Mason-Andrus, Jane E	747 Merton Ave, Akron, Ohio 44306 United States	2011 Chevy HHR	3GNB8BFW8B5648637	10/24/13	Akron, OH	Northern District of Ohio
188	Mata, Robert	730 Brunswick Blvd, San Antonio, Texas 78214 United States	2009 Chevy HHR	3GNCA23V79S562696	4/15/14	San Antonio, TX	Western District of Texas
189	Mathison, Rebecca	14259 E. Ravine Run, Willis, Texas 77318 United States	2007 Chevy Cobalt	1G1AK15F277387436	6/17/14	Conroe, TX	Southern District of Texas
190	Matthews, Dolly	570 Johnson Street, Nash, Texas 75569 United States	2008 Chevy Trailblazer	1GNDS135682216294	11/16/14	Texarkana, TX	Eastern District of Texas
191	McCann, Julie	10560 Club Mont Ln., Raleigh, North Carolina 27617 United States	2009 Pontiac G6	1G2ZG57B594202446	5/21/13	Mooreville, NC	Western District of North Carolina
192	McCarthy, Eric	2913 Kilcairn lane, Allison Park, Pennsylvania 15101 United States	2008 Chevy Cobalt	1G1AK58FD87267204	8/1/13	Pittsburgh, PA	Western District of Pennsylvania
193	McDonald, Brian	800 Lexington St. Trailer 202, Norman, Oklahoma 73069 United States	2007 Chevy Cobalt	1G1AK15F377365817	12/11/12	Norman, OK	Western District of Oklahoma
194	McGhee, Annie	14100 Carrydale Ave, Cleveland, Ohio 44111 United States	2006 Chevy Cobalt	1G1AK15F167831887	3/8/14	Cleveland, OH	Northern District of Ohio
195	McIlwain, Lorrie	2415 Boca Chica Drive, Portland, Texas 78374 United States	2007 Chevy Cobalt	1G1AL55F177124021	2/27/14	Portland, TX	Southern District of Texas
196	McKenzie, Alexis	1160 Northwest 147th St., Miami, Florida 33168 United States	2006 Chevy Cobalt	11AL15F567806665	11/24/13	North Miami, FL	Southern District of Florida
197	McKinney, Elizabeth	115 Ruffian Trail, Georgetown, Kentucky 40324 United States	2007 Chevy Cobalt	1G1AK55F177377388	12/5/10	Lexington, KY	Eastern District of Kentucky
198	McNew, Nathan	4799 Via Palm Lake Unit 1619, West Palm Beach, Florida 33417 United States	2005 Chevy Cobalt	1G1AL52F057511239	8/24/10	Greenacres, FL	Southern District of Florida
199	McQueen, Joann	4250 Hillmanway Apt 7, Boardman, Ohio 44512 United States	2006 Chevy Cobalt	1G1AL15F967670458	4/1/14	Boardman, OH	Northern District of Ohio
200	Memmer, Ed	89 E. Evergreen Ave., Youngstown, Ohio 44507 United States	2007 Chevy Cobalt	1G1A254F857621337	9/8/09	Youngstown, OH	Northern District of Ohio
201	Miller, Amy	4135 Walnut Rd., Buckeye Lake, Ohio 43008 United States	2005 Chevy Cobalt	1G1AK52F757545410	3/20/13	Licking Township, OH	Southern District of Ohio
202	Minton, Pamela	1425 Teague Rd Apt 505, Myrtle Beach, South Carolina 29577 United States	2008 Chevy Cobalt	1G1AK18F687338737	3/26/13	Myrtle Beach, SC	District of South Carolina
203	Monisera, Michael	6315 Linton Street, Jupiter, Florida 33458 United States	2008 Chevy HHR	3GCCA85D385663541	4/2/12	West Palm Beach, FL	Southern District of Florida
204	Monroe, Kimberley	5938 Chance Drive Apt A, Horn Lake, Mississippi 38637 United States	2006 Chevy HHR	3GNDA13D065612694	5/3/14	Walls, MS	Northern District of Mississippi
205	Moore, Patricia	2243 Missouri St, Baton Rouge, Louisiana 70802 United States	2003 Saturn L200	1G8JU54F13Y513066	2/24/14	Baton Rouge, LA	Middle District of Louisiana
206	Moore, Robert	10607 Alondra Peak St., Las Vegas, Nevada 89183 United States	2006 Chevy HHR	3GNDA23P265510412	11/22/13	Henderson, NV	District of Nevada
207	Moore, Tajuan	8832 Santabella, Hazelwood, Missouri 63042 United States	2006 Chevy Cobalt	1G1AK15F567825932	2/3/13	St Louis, MO	Eastern District of Missouri

No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
208	Morris, Darryl	619 Springfield Street Apt. 4, Feeding Hills, Massachusetts 01030 United States	2005 Saturn Ion	1G8AL52F85Z103495	1/2/10	Feeding Hills, MA	District of Massachusetts
209	Mosley, Constance	5518 West Loop 281 Apt. 132, Longview, Texas 75602 United States	2008 Chevy Cobalt	1G1AL58F687110922	2/3/14	Jefferson, TX	Eastern District of Texas
210	Mosley, Shannon	2203 S Larsen Rd, Avon Park, Florida 33825 United States	2003 Saturn Ion	1G8AJ52F93Z133978	12/4/13	Avon Park, FL	Southern District of Florida
211	Moultrie, Mary	1607 MLK Drive, Elizabeth Town, North Carolina 28337 United States	2009 Chevy Cobalt	1G1AT58H497125342	2/28/13	White Lake, NC	Eastern District of North Carolina
212	Mounts, William	329 S. Center St., Forrest, Illinois 61741 United States	2005 Saturn Ion	1G8AL52F15Z174568	6/14/10	Lombard, IL	Northern District of Illinois
213	Mower, Randy	1094 West 1520 North Apt. G, Ogden, Utah 84404 United States	2010 Chevy HHR	3GNBAAD89A5553819	4/17/14	Ogden, UT	District of Utah
214	Munoz, Armando	PO Box 41, Broken Arrow, Oklahoma 74013 United States	2007 Chevy HHR	3GNDA13DX75634509	9/10/12	Denton, TX	Eastern District of Texas
215	Munoz, Carol	612 S. Lariat Dr., Mustang, Oklahoma 73064 United States	2008 Chevy Cobalt	1G1AL18F687267357	6/11/13	Mustang, OK	Western District of Oklahoma
216	Murchison, Tyrone	3243 Peanut Plant Rd., Elizabethtown, North Carolina 28337 United States	2009 Chevy Cobalt	1G1AC58H497125342	2/28/13	Elizabethtown, NC	Eastern District of North Carolina
217	Murphy-Turner, Maya	537 E. Kenbridge Dr., Carson, California 90746 United States	2006 Saturn Ion	G8AN18F66Z185982	4/3/14	Los Angeles, CA	Central District of California
218	Murray, Meghan	6320 Forest Preserve Rd., Rockton, Illinois 61072 United States	2010 Chevy Cobalt	1G1AF5F54A7121165	4/4/14	Big Bend, WI	Eastern District of Wisconsin
219	Myers, Yvonne	411 North Alex Alford Dr, Georgetown, South Carolina 29440 United States	2008 Pontiac G6	1G2ZG57N684162466	5/26/12	Manning, SC	District of South Carolina
220	Myrick, Aaron	1508 East 37th St, Kansas City, Missouri 64109 United States	2008 Pontiac G6	1G2ZH57N184124673	11/25/13	Topeka, KS	District of Kansas
221	Neal, Amanda	143 Paul Evans Rd, Climax, Georgia 39834 United States	2009 Chevy Cobalt	1G1AT58H997286334	4/19/13	Tallahassee, FL	Northern District of Florida
222	Nelson, Janelle	3464 Kingston St., Jacksonville, Florida 32254 United States	2007 Saturn Ion	1G8AJ55F472162791	3/6/14	Jacksonville, FL	Middle District of Florida
223	Nolan, Timothy	12786 Burns Rd., California, Kentucky 41007 United States	2006 Pontiac Solstice	1G2MB33B46Y11087	9/8/10	Alexandria, KY	Eastern District of Kentucky
224	Norville, Amy	749 Bleich Rd. Lot 8, Paducah, Kentucky 42003 United States	2003 Saturn Ion	1G8AW12F63Z176541	11/21/13	Gage, KY	Western District of Kentucky
225	Oden, DeAndrea	1910 Grant Ave., Panama City, Florida 32405 United States	2005 Chevy Malibu	1G1ND52F75M146185	1/11/13	Pell City, AL	Northern District of Alabama
226	Odom, Emary	83 Davis Memorial Rd, Roanoke Rapids, North Carolina 27870 United States	2007 Saturn Sky	1G8MB35B47Y114077	5/29/14	Roanoke Rapids, NC	Eastern District of North Carolina
227	Oliver, Latisha	7450 E. 32nd St. N Apt #306, Wichita, Kansas 67226 United States	2003 Saturn Ion	1G8AK52F03Z179793	8/28/13	Wichita, KS	District of Kansas
228	Osborne, Stefanie Individually, and as Next Friend of Sophia Davis	P.O. Box 363, Derry, Pennsylvania 15627 United States	2005 Chevy Cobalt	1G1AK52FX57519044	3/7/13	Derry, PA	Western District of Pennsylvania
229	Paige, Kathary	548 Gwinette Street, Aiken, South Carolina 29801 United States	2004 Saturn Ion	168AM12F24Z181128	4/14/12	Graniteville, SC	District of South Carolina
230	Parker, Melissa	12277 Apple Valley Rd #411, Apple Valley, California 92308 United States	2006 Chevy Cobalt	G1AL55FX67657712	9/28/12	Apple Valley, CA	Central District of California

No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
231	Parow, Laura M.	40046 Berry Blvd., La Fargeville, New York 13656 United States	2006 Saturn Ion	1G8AL55F66Z140994	12/18/13	Alexandria Bay, NY	Northern District of New York
232	Parsons, Rita	1500 Logan St., Jacksonville, Florida 32209 United States	2008 Chevy HHR	3GNEA13D685544601	8/28/13	Jacksonville, FL	Middle District of Florida
233	Patterson, Michael	3456 Vanburen, Ogden, Utah 84403 United States	2007 Pontiac G5	1G2AL15F677349863	5/30/13	Ogden, UT	District of Utah
234	Payne, Cierra	113 St. Paul Dr., Cahokia, Illinois 62206 United States	2007 Pontiac G5	1G2A15F677154698	4/9/12	St. Louis, MO	Eastern District of Missouri
235	Pearsall, Latesha D	124 S Running Deer Circle, Dudley, North Carolina 28333 United States	2006 Chevy Cobalt	1G1AL55F467768224	4/21/14	Goldsboro, NC	Eastern District of North Carolina
236	Petty, Dorothy	1402 East OBear Ave, St Louis, Missouri 63107 United States	2007 Chevy Cobalt	1G1AL58F477205686	1/13/13	St. Louis, MO	Eastern District of Missouri
237	Pierre, Kachet	1821 West 26th Street Apt 34, Lawrence, Kansas 66046 United States	2008 Pontiac G6	1G2Z57N184124673	11/25/13	Topeka, KS	District of Kansas
238	Pigatt, Anthony	1423 Hadwick Dr Apt J, Essex, Maryland 21221 United States	2007 Pontiac G5	1G2AL5F877367670	4/25/12	Essex, MD	District of Maryland
239	Pigg, Jean	354 4th st, Atlantic Beach, Florida 32233 United States	2007 Saturn Sky	1G8MB35B87Y106369	5/5/10	St. Augustine, FL	Middle District of Florida
240	Player, Leonidas	3512 Milton Street., Shreveport, Louisiana 71109 United States	2005 Saturn Ion	1G8AN12FQ5Z111299	5/12/14	Shreveport, LA	Western District of Louisiana
241	Poole, Tannell	2807 Misty Waters Drive Apt 35, Decatur, Georgia 30032 United States	2008 Chevy Cobalt	1G1AL58F287208975	12/23/13	Decatur, GA	Northern District of Georgia
242	Pridgen, Clifford	3 Shay St, Edgefield, South Carolina 29824 United States	2006 Chevy Cobalt	1G1AK55F267867255	4/10/11	Atlanta (Fulton County), GA	Northern District of Georgia
243	Quarles, Miesha	P.O. Box 252, Washington, Arkansas 71862 United States	2007 Chevy Cobalt	1G1AK15F488405646	2/9/12	North Little Rock, AR	Eastern District of Arkansas
244	Quick Jr, James	43 Brookside Dr. West, Harriman, New York 10926 United States	2006 Saturn Ion	1G8AL58F16Z196675	9/9/13	Bronx, NY	Southern District of New York
245	Quinones, Ana Lourdis	12475 NW 27th Ave Apt 207, Miami, Florida 33167 United States	2006 Chevy Cobalt	1G1AK55F367846107	1/24/14	Hialeah, FL	Southern District of Florida
246	Rawlings, Christopher	529 Maple Street, Roanoke Rapids, North Carolina 27870 United States	2007 Chevy Cobalt	1G1AM55B277390366	6/4/14	Roanoke Rapids, NC	Eastern District of North Carolina
247	Rayner-Creel, Kelli	161 Tennyson Cove, Picayune, Mississippi 39466 United States	2009 Chevy Cobalt	1j1at58h9977114630	2/28/10	Picayune, MS	Southern District of Mississippi
248	Reagle, Marjorie	11020 NE 50th, Spencer, Oklahoma 73084 United States	2007 Chevy Cobalt	1G1AK55F177326375	11/24/13	Oklahoma City, Ok	Western District of Oklahoma
249	Richey, Alicia	13712 West Rim Drive #915, Euless, Texas 76040 United States	2007 Chevy HHR	3gnda13d27620104	10/5/09	Cedar Hill, TX	Northern District of Texas
250	Ricketts, Byron	PO Box 252, Abbottstown, Pennsylvania 17301 United States	2007 Chevy Cobalt	1G1AK55F477307531	12/1/09	Abbottstown, PA	Middle District of Pennsylvania
251	Roberts, Merelene	200 Bostic Dr., Apt 102, Longview, Texas 75602 United States	2004 Cadillac DeVille	1G6KD54Y74U214026	7/18/14	Longview, TX	Eastern District of Texas
252	Roberts, Robbie	703 Perching Court, Mt. Pleasant, South Carolina 29464 United States	2005 Chevy Cobalt	1G1AK52F757550901	3/17/14	Charleston, SC	District of South Carolina
253	Robinson, Dorian	2123 W. Glenrosa Ave Apt. 2, Phoenix, Arizona 85015 United States	2006 Pontiac Grand Prix	2G2WP552861228173	12/6/13	Riverside, IA	Southern District of Iowa



No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
254	Robles, Elizabeth	4805 Lansdown Dr., Corpus Christi, Texas 78411 United States	2006 Chevy Cobalt	1G1AK15F767785773	3/2/14	Corpus Christi, TX	Southern District of Texas
255	Rodgers, Meghan	10242 Hillenberg Lane, Houston, Texas 77034 United States	2006 Saturn Ion	1G8AJ55F66Z163617	3/23/14	Houston, TX	Southern District of Texas
256	Rodriguez, Miranda	9960 Springland Dr., Whittier, California 90601 United States	2005 Chevy Cobalt	1G1AL12F557644703	11/25/11	El Monte, CA	Central District of California
257	Ross, Erin	439 Buck Mountain Road, Crown Point, New York 12928 United States	2007 Chevy Cobalt	1G1AP11P577144039	12/30/11	Crown Point, NY	Northern District of New York
258	Rude, Michael	1751 25th Ave South, Wisconsin Rapids, Wisconsin 54495 United States	2007 Chevy Cobalt	1G1AL55F977169837	9/9/10	Rifle, CO	District of Colorado
259	Rude, Rachel	1751 25th Avenue South, Wisconsin Rapids, Wisconsin 54495 United States	2007 Chevy Cobalt	1G1AL55F977169837	9/9/10	Rifle, CO	District of Colorado
260	Rush, Sandra	7975 San Cosme, Citrus Heights, California 95610 United States	2006 Chevy HHR	3GNDA23P06S568583	2/3/14	Rancho Cordova, CA	Eastern District of California
261	Russell, Brenda	2104 Emerald Pointe Dr. Apt 7, Birmingham, Alabama 35216 United States	2005 Chevy Cobalt	1G1AK52F557619598	7/11/13	Alabaster, AL	Northern District of Alabama
262	Sanders, Kitty	15 Kestrel Circle, Covington, Georgia 30014 United States	2007 Pontiac Solstice	1G2MB35B67Y142554	6/4/12	Maddison, GA	Northern District of Georgia
263	Sargent, Tammy	20 Pike St., Biddeford, Maine 04005 United States	2007 Chevy Cobalt	1G1AK15F477189845	7/27/12	South Portland, ME	District of Maine
264	Scheuer, Robert	P. O. Box 702906, Tulsa, Oklahoma 74170 United States	2003 Saturn Ion	1G8AW12F03Z205144	5/28/14	Bristow, OK	Northern District of Oklahoma
265	Scott, Alexis	300 Meadow Park, North Little Rock, Arkansas 72117 United States	2006 Chevy HHR	3GNDA23P86SD66660	3/2/13	Mayflower, AR	Eastern District of Arkansas
266	Selix, Lanette	P.O. Box 213, Wildomar, California 92595 United States	2006 Pontiac G6	1G2ZH178464288094	4/1/14	Wildomar, CA	Central District of California
267	Shell, James	1147 N. Carey Street, Baltimore, Maryland 21217 United States	2007 Chevy Cobalt	1G1AK55FX77307775	3/13/12	Baltimore, MD	District of Maryland
268	Shirley, Danielle	1055 SE 4th Ave., Arcadia, Florida 34266 United States	2006 Chevy HHR	3GNDA13D36F555987	5/21/14	Arcadia, FL	Middle District of Florida
269	Simon, Richard	92 Tilley Lane, Osage, Oklahoma 74054 United States	2007 Pontiac Grand Prix	2G2WP552171222580	5/1/14	Osage, OK	Northern District of Oklahoma
270	Slate, Charles Davids	1208 Talley Dr, Clarksville, Tennessee 37040 United States	2007 Chevy HHR	3GNDA13D675618307	10/26/13	Pleasant View, TN	Middle District of Tennessee
271	Smith, Ardella	1612 Woodrow St., Shreveport, Louisiana 71103 United States	2005 Saturn Ion	1G8AN12FQ5Z111299	5/12/14	Shreveport, LA	Western District of Louisiana
272	Smith, Cory Shane	620 E. Cecil St, Springfield, Ohio 45503 United States	2005 Chevy Cobalt	1G1AK12F157670931	10/25/13	Springfield, OH	Southern District of Ohio
273	Smith, Jesse	220 Jackson Street, Sistersville, West Virginia 26175 United States	2006 Chevy Cobalt	1G1AK55F367812944	5/25/13	Wallace, WV	Northern District of West Virginia
274	Smith, Patricia	P.O. Box 4082, Fort Pierce, Florida 34948 United States	2008 Pontiac G6	1G2ZG558464248658	2/24/12	Fort Pierce, FL	Southern District of Florida
275	Smith, Tanya	220 Jackson Street, Sistersville, West Virginia 26175 United States	2006 Chevy Cobalt	1G1AK55F367812944	5/25/13	Wallace, WV	Northern District of West Virginia
276	Snyder, Brenda	85 River St. P.O. Box 36, Nicholville, New York 12965 United States	2006 Chevy HHR	3GNDA23D765590263	2/15/13	Malone, NY	Northern District of New York

No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
277	Spencer, Carrie	5463 Highway 71 South, Cove, Arkansas 71937 United States	2008 Chevy HHR	3GNDA13D285555952	5/10/13	Mena, AR	Western District of Arkansas
278	Stewart, Juanita	116 Hay, Park Forest, Illinois 60466 United States	2004 Saturn Ion	1G8AJ52F64Z211747	10/22/11	Park Forest, IL	Northern District of Illinois
279	Stewart, Krista	Rt 1 Box 661, Delbarton, West Virginia 25670 United States	2013 Chevy Camaro	2G1FB1E34D9137413	1/17/14	Delbarton, WV	Southern District of West Virginia
280	Stinchcomb, William	5449 Kirkland Way, Columbus, Ohio 43231 United States	2008 Chevy Cobalt	1G1AL58F487238530	12/10/12	Columbus, OH	Southern District of Ohio
281	Styles, Brenda	1703 Sugarhill Rd., Dillon, South Carolina 29536 United States	2004 Saturn Ion	1G8AJ52F94Z208180	12/3/11	Marion, SC	District of South Carolina
282	Surratt, Sonya	6828 Parkwood St., Landover Hills, Maryland 20784 United States	2006 Saturn Ion	1G8AJ55FX6Z185426	10/13/13	Landover Hills, MD	District of Maryland
283	Taylor, Amy	8161 Private Road 2037, Odem, Texas 78370 United States	2010 Chevy Cobalt	1G1AB1F50A7237998	9/14/12	Kerrville, TX	Western District of Texas
284	Tazwell, Dorothy	P.O. BOX 51, Eastville, Virginia 23347 United States	2006 Chevy Cobalt	1G1K55F167690228	1/1/10	Garysburg, NC	Eastern District of North Carolina
285	Tedder, Brittany	2381 Horse Branch Rd., Turbeville, South Carolina 29162 United States	2007 Chevy HHR	3GNDA13D475622954	8/11/13	Near Turbeville, SC	District of South Carolina
286	Terry, Davina	625 South Main Street, Pittsburgh, Pennsylvania 15220 United States	2007 Chevy Cobalt	1G1AL15F177193283	6/10/14	Pittsburgh, PA	Western District of Pennsylvania
287	Terry, Terrene	328 W Elmer St, Vineland, New Jersey 08360 United States	2006 Saturn Ion	1G8AJ55F56Z115266	4/1/14	Vineland, NJ	District of New Jersey
288	Thayer, Danielle	105 Catherine Street, Canastota, New York 13032 United States	2006 Chevy Cobalt	1G1AK55F067790644	11/9/11	Sullivan, NY	Northern District of New York
289	Thomas, Flossie	P. O. Box 903, Magnolia, Arkansas 71754 United States	2010 GMC Acadia	1GKLRED5AJ175533	4/1/14	Magnolia, AR	Western District of Arkansas
290	Thomas, Tyneka M	405 Williams Drive, Bastrop, Louisiana 71220 United States	2005 Chevy Cobalt	1G1AK52F157514637	7/5/12	Bastrop, LA	Western District of Louisiana
291	Thompson, Willie S.	2451 W. Cumberland St., Philadelphia, Pennsylvania 19132 United States	2013 Chevy Traverse		1/1/13	Philadelphia, PA	Easter District of Pennsylvania
292	Thornton, Natisha	170 Caroline Court, Circleville, Ohio 43113 United States	2006 Chevy HHR	3GNDA23P065649387	12/12/13	Liberty, OH	Southern District of Ohio
293	Todd, Dawna	52 Rounds, Buffalo, New York 14215 United States	2008 Chevy HHR	3GNCA23DX85724990	11/25/13	Cheektowaga, NY	Western District of New York
294	Torres, Dennis	1983 Oakwell Farms Parkway Apt. 408, San Antonio, Texas 78218 United States	2010 Chevy Impala	2G1WA5EN0A1104351	5/26/14	San Antonio, TX	Western District of Texas
295	Towne, Patricia	820 Harvard, Blvd, Lynn Haven, Florida 3244 United States	2008 Cadillac CTS	1G6DF577X80144976	1/9/13	Panama City, FL	Northern District of Florida
296	Tucker, Jill	468 Martha Dr., Meadville, Pennsylvania 16335 United States	2004 Saturn Ion	1G8AL52F94Z217455	3/13/14	Meadville, PA	Western District of Pennsylvania
297	Tudor, Ellen	331 Lincoln Hills, Coatesville, Indiana 46121 United States	2005 Chevy Malibu	1G1ZT62895F277702	8/19/10	Avon, IN	Southern District of Indiana
298	Umberger, Terri	115 Dabney Dr., Wytheville, Virginia 24382 United States	2008 Chevy Cobalt	1G1AK18F987180037	5/4/14	Wytheville, VA	Western District of Virginia
299	Vasquez, Leticia	311 S San Gabriel Ave, San Antonio, Texas 78237 United States	2004 Saturn Ion	1G8AW12F142160278	8/18/13	San Antonio, TX	Western District of Texas



No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
300	Vaughn, Anthony	P.O. Box 25427, Dayton, Ohio 45424 United States	2007 Pontiac G6	1G2ZH35N374190292	9/6/12	Bath, OH	Southern District of Ohio
301	Villcheck, Debra	19050 Stratford Rd Apt 302, Minneponka, Minnesota 55345 United States	2006 Saturn Ion	1G8AL55876Z179915	2/21/14	Minneponka, MN	District of Minnesota
302	Vinson, Danny	115 Ironwood Dr., Roanoke Rapids, North Carolina 27870 United States	2006 Chevy Cobalt	1G1AL15F277360265	10/15/13	Chesapeake, VA	Eastern District of Virginia
303	Wade, Wesley	4717 Berrige Lane, Dallas, Texas 75227 United States	2006 Chevy HHR	3GNDA13D065641886	5/5/13	Dallas, TX	Northern District of Texas
304	Walker, Jermaine Devontia	210 Medical Arts Dr Apt B, Sandersville, Georgia 31082 United States	2006 Chevy Cobalt	1G1AK55F0678840	10/7/13	Sandersville, GA	Middle District of Georgia
305	Walker, Shane	800 Wilson Ave., Valdosta, Georgia 31602 United States	2005 Chevy Cobalt	1G1A52F357588932	6/26/11	Jennings, FL	Middle District of Florida
306	Ward, Mary	13546 Eldridge Trace Drive, Houston, Texas 77083 United States	2007 Chevy HHR	3Gnda33p17s572892	5/26/13	Houston, TX	Southern District of Texas
307	Ward, Michelle	207 Banks Station, Fayetteville, Georgia 30214 United States	2004 Saturn Ion	1G8AY12P04Z213782	8/1/12	Fayetteville, GA	Northern District of Georgia
308	Ward-Green, Lakisha	8878 W. Wood Rd., Pittsburg, Pennsylvania 15235 United States	2007 Chevy Cobalt	1G1AK55F077105429	9/3/10	Pittsburgh, PA	Western District of Pennsylvania
309	Washington, Michael	320 South 15th Street, Harrisburg, Pennsylvania 17104 United States	2007 Saturn Ion	1G8AZ55F86Z154670	1/4/10	Harrisburg, PA	Middle District of Pennsylvania
310	Westemeier, Ryan	106 N Burger Parkway Apt 212, Fond Du Lac, Wisconsin 54935 United States	2009 Chevy Cobalt	1G1AT58H497244654	2/27/13	Fond Du Lac, WI	Eastern District of Wisconsin
311	White, Tabitha Ashley	44 N. Mulberry St., Chillicothe, Ohio 45601 United States	2007 Chevy HHR	3CNDA13D175597768	4/21/14	Chillicothe, OH	Southern District of Ohio
312	White, Tabitha Ashley Individually, and as Next Friend of Robert Harris	44 N. Mulberry St., Chillicothe, Ohio 45601 United States	2007 Chevy HHR	3CNDA13D175597768	4/21/14	Chillicothe, OH	Southern District of Ohio
313	White, Teresa	44 N. Mulberry St., Chillicothe, Ohio 45601 United States	2007 Chevy HHR	3CNDA13D175597768	4/21/14	Chillicothe, OH	Southern District of Ohio
314	Williams, Canitra	504 CR 263 Loop, Cameron, Texas 76520 United States	2009 Chevy Cobalt	1G1AT58H897263692	11/25/12	Branchville, TX	Western District of Texas
315	Williams, Canitra Individually, and as Next Friend of Laciara Williams	504 CR 263 Loop, Cameron, Texas 76520 United States	2009 Chevy Cobalt	1G1AT58H897263692	11/25/12	Branchville, TX	Western District of Texas
316	Williams, Charles	501 Swan Dr Apt 203, Athens, Alabama 35611 United States	2006 Chevy HHR	3GNDA130365511889	3/15/12	Athens, AL	Northern District of Alabama
317	Williams, Edward	1500 Logan St., Jacksonville, Florida 32209 United States	2008 Chevy HHR	3GNEA13D685544601	8/28/13	Jacksonville, FL	Middle District of Florida
318	Williams, Gloria	1335 Half Street, Washington, District of Columbia 20024 United States	2006 Saturn Ion	1G8AL58BX6Z168791	4/1/14	Washington, DC	District of Columbia
319	Williams, Jekerrius Individually, and as Next Friend of Jayla Williams	1095 Villarica Court Apt A, Birmingham, Alabama 35215 United States	2005 Chevy Cobalt	1G1AK52F457564884	4/6/11	Birmingham, AL	Northern District of Alabama
320	Williams, Jekerrius Individually, and as Next Friend of Jekerrius Williams Jr	1095 Villarica Court Apt A, Birmingham, Alabama 35215 United States	2005 Chevy Cobalt	1G1AK52F457564884	4/6/11	Birmingham, AL	Northern District of Alabama
321	Williams, Jessica	626 Heritage Way, Cameron, North Carolina 28326 United States	2009 Chevy HHR	3GNCA53V795410599	3/1/13	Cameron, NC	Eastern District of North Carolina
322	Williams, Katie	510 1/2 Randolph Street, Charleston, West Virginia 25302 United States	2008 Pontiac G6	1G2ZF57B384266583	4/11/14	Charleston, WV	Southern District of West Virginia

No.	Name of Plaintiff(s)	Residency	Car Type	VIN #	Incident Date	Accident City/State	US Dist Court
323	Williams, Pat	228 3rd Ave. South, Kirkland, Washington 98033 United States	2007 Chevy Cobalt	1G1AL55F477278920	3/2/14	Snohomish, WA	Western District of Washington
324	Williams, Roxana	2109 Faulk Dr., Tallahassee, Florida 32303 United States	2003 Saturn Ion	1G8AL52F13Z141275	5/2/12	Perry, FL	Northern District of Florida
325	Williams, Tanjan	4605 Tippy Circle Apt 105, Louisville, Kentucky 40216 United States	2007 Chevy Cobalt	1G1AK55F177410826	4/15/12	Louisville, KY	Western District of Kentucky
326	Williamson, Mary	204 E. Railroad St., Gulfport, Mississippi 39507 United States	2009 Chevy HHR	3GNCA23B39S543472	6/23/13	Biloxi, MS	Southern District of Mississippi
327	Wilson, John	1310 French Rd., Byhalia, Mississippi 38611 United States	2008 Chevy Cobalt	1G1AK58F687185056	10/24/13	Memphis, TN	Western District of Tennessee
328	Woodall, Martha	4038 Suzan Drive, Anderson, Indiana 46013 United States	2008 GMC Acadia	1GKER23728J223831	9/27/10	Washington, IN	Southern District of Indiana
329	Wright, Dawn	5235 4th St., Baltimore, Maryland 21225 United States	2003 Saturn Ion	1G8AG52F43Z106363	8/21/12	Anne Arundel, MD	District of Maryland
330	Young, Philip	P.O. Box 627, Clevand, Georgia 30528 United States	2006 Chevy Cobalt	1G1AK55F167681478	11/16/11	Gainesville, GA	Northern District of Georgia